

ORIGINAL

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

- - - - - x

VALENTIA VILLETTI and FAIZA JIBRIL, M.D.,
Plaintiffs,

Index No.

1:18-cv-10200-VSB-KNF

-against-

GUIDEPOINT GLOBAL, LLC,
Defendant.

- - - - - x

One Battery Park
New York, New York

October 1st, 2019
10:10 a.m.

EXAMINATION BEFORE TRIAL of
VALENTIA VILLETTI, a Plaintiff herein, taken
by the Defendant, in the above-entitled
action, held at the above time and place,
pursuant to Case Management Order, taken
before SALVATRICE MANNINO, a Shorthand
Reporter and Notary Public within and for the
State of New York.

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JAN 13 2020

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S T I P U L A T I O N S

IT IS STIPULATED AND AGREED by and between
the attorneys for the respective parties
herein, and in compliance with Rule 221 of the
Uniform Rules for the Trial Courts:

THAT the parties recognize the provision of
Rule 3115 subdivisions (b), (c) and/or (d).
All objections made at a deposition shall be
noted by the officer before whom the
deposition is taken, and the answer shall be
given and the deposition shall proceed subject
to the objections and to the right of a person
to apply for appropriate relief pursuant to
Article 31 of the CPLR;

THAT every objection raised during a
deposition shall be stated succinctly and
framed so as not to suggest an answer to the
deponent and, at the request of the
questioning attorney, shall include a clear
statement as to any defect in form or other
basis of error or irregularity. Except to the
extent permitted by CPLR Rule 3115 or by this
rule, during the course of the examination
persons in attendance shall not make

1
2 statements or comments that interfere with the
3 questioning.

4 THAT a deponent shall answer all questions
5 at a deposition, except (i) to preserve a
6 privilege or right of confidentiality, (ii) to
7 enforce a limitation set forth in an order of
8 a court, or (iii) when the question is plainly
9 improper and would, if answered, cause
10 significant prejudice to any person. An
11 attorney shall not direct a deponent not to
12 answer except as provided in CPLR Rule 3115 or
13 this subdivision. Any refusal to answer or
14 direction not to answer shall be accompanied
15 by a succinct and clear statement on the basis
16 therefore. If the deponent does not answer a
17 question, the examining party shall have the
18 right to complete the remainder of the
19 deposition.

20 THAT an attorney shall not interrupt the
21 deposition for the purpose of communicating
22 with the deponent unless all parties consent
23 or the communication is made for the purpose
24 of determining whether the question should not
25 be answered on the grounds set forth in

1

2 Section 221.2 of these rules, and, in such
3 event, the reason for the communication shall
4 be stated for the record succinctly and
5 clearly.

6 THAT the failure to object to any question
7 or to move to strike any testimony at this
8 examination shall not be a bar or waiver to
9 make such objection or motion at the time of
10 the trial of this action, and is hereby
11 reserved; and

12 THAT this examination may be signed and
13 sworn to by the witness examined herein before
14 any Notary Public, but the failure to do so or
15 to return the original of the examination to
16 the attorney on whose behalf the examination
17 is taken, shall not be deemed a waiver of the
18 rights provided by Rules 3116 and 3117 of the
19 C.P.L.R, and shall be controlled thereby; and

20 THAT the certification and filing of the
21 original of this examination are hereby
22 waived; and

23 THAT the questioning attorney shall provide
24 counsel for the witness examined herein with a
25 copy of this examination at no charge.

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1 V. VILLETTI
2 V A L E N T I A V I L L E T T I, the
3 Witness herein, having been first
4 duly sworn by a Notary Public of the
5 State of New York, was examined and
6 testified as follows:

7 EXAMINATION

8 BY MR. GRECH:

9 THE COURT REPORTER: State
10 your name for the record,
11 please.

12 THE WITNESS: Valentia
13 Villetti.

14 THE COURT REPORTER: State
15 your address for the record,
16 please.

17 THE WITNESS: 162 East
18 61st Street, Apartment 1B,
19 New York, New York 10065.

20 Q. Good morning Ms. Villetti. My
21 name is David Grech. I am a Senior
22 Counsel with Gordon and Rees in their
23 employment practice liability group.
24 We represent Guidepoint Global, LLC
25 in this action.

1 V. VILLETTI

2 I'm just going to give you a
3 few instructions before we begin. If
4 you have any questions about my
5 instructions or at any point as we go
6 along, just let me know, let your
7 Counsel know.

8 This is a question-and-answer
9 session, so we will ask some
10 questions and we may show you some
11 documents regarding your employment
12 in this lawsuit. This is a
13 deposition, so it is a
14 question-and-answer session. To
15 questions, we expect answers.

16 If you don't understand a
17 question, I'll do my best to rephrase
18 it. If you ask me, we'll do so.
19 Your responses must be verbal. No
20 nodding, no gestures, because the
21 reporter must take down all of your
22 responses for the transcript.

23 On that note, so that the
24 record of transcript is clear, even
25 if you can sort of guess what my

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1 V. VILLETTI
2 question might be even before I
3 finish it, just for the sake of the
4 transcript, let me finish it and then
5 you can respond.

6 If you need a break at any
7 time, just let us know; let your
8 Counsel know, and we'll accommodate
9 you. All that we ask is that if
10 there is a question pending at that
11 point, that you answer the question
12 and then we move on, and then we'll
13 take the break.

14 It's also my understanding
15 that we have a hard stop today at
16 2:00, so we're going to do our best
17 to accommodate that and get you out
18 of here at 2:00 and then Counsel and
19 I will discuss where we are at that
20 point, in terms of your deposition.

21 A. Okay.

22 Q. Do you have any questions
23 about those preliminaries?

24 A. No.

25 Q. Do you know why we are here

1 V. VILLETTI

2 today?

3 A. Yes.

4 Q. Why is that?

5 A. For a deposition.

6 Q. Okay. You're suing Guidepoint
7 Global?

8 A. Yes.

9 Q. Why?

10 A. I am suing them because they
11 discriminated against me based on my
12 sex as a woman, and retaliated
13 against my complaint.

14 Q. Which complaint is that?

15 A. Complaining about
16 discrimination against my sex as a
17 woman.

18 Q. Ms. Villetti, what is the
19 highest level of education you've
20 obtained?

21 A. Bachelor's Degree.

22 Q. From what institution?

23 A. Columbia University of
24 New York.

25 Q. When did you acquire that

Page 10

1 V. VILLETTI

2 degree?

3 A. 2012.

4 Q. What was your first employment
5 following your obtaining that degree?

6 A. ABR Healthco.

7 Q. When did you begin with ABR?

8 A. Early 2013.

9 Q. How long were you there?

10 A. Early 2014.

11 Q. What was your title at ABR?

12 A. Equity Research Associate.

13 Q. What were your duties at ABR
14 as an Equity Research Associate?

15 A. We analyzed pharmaceutical
16 stocks.

17 Q. There came a point in time
18 when you left ABR?

19 A. Yes.

20 Q. What happened next in terms of
21 your employment?

22 A. I joined Bridgewater
23 Associates.

24 Q. When did that occur?

25 A. Early 2014.

1 V. VILLETTI

2 Q. How long were you at
3 Bridgewater?

4 A. Until late 2014.

5 Q. What title were you employed
6 by Bridgewater?

7 A. First as an investment
8 associate and then as a management
9 associate.

10 Q. For what period of time were
11 you an investment associate?

12 A. Half that time.

13 Q. And the remaining half, you
14 were a management associate?

15 A. Correct.

16 Q. Is that considered a transfer?
17 a promotion?

18 A. Just a transfer.

19 Q. Going back to your education
20 for a moment, what was your degree
21 in?

22 A. I double majored in
23 physical science and philosophy and
24 minor economics.

25 Q. Separate and apart from your

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1 V. VILLETTI

2 studies at Columbia, did you have any
3 training that would have helped you
4 perform duties as an equity research
5 associate?

6 A. No.

7 Q. Did you have any training that
8 would've helped you perform your
9 duties as an investment associate or
10 a management associate at
11 Bridgewater?

12 A. Other than their training, no.

13 Q. What sort of training did you
14 receive at Bridgewater?

15 A. They provide a course.

16 Q. A course in what?

17 A. They provide a course for
18 their investment associates and
19 another one for their in management
20 associates.

21 Q. So you took each course?

22 A. Mm-hmm.

23 MR. LICHTEN: You have to
24 use words.

25 A. Yes.

1 V. VILLETTI

2 Q. There came a point in time
3 where you left Bridgewater?

4 A. Yes.

5 Q. What was your next employment
6 position after that?

7 A. I returned to ABR Healthco.

8 Q. In what capacity?

9 A. As an equity research analyst.

10 Q. When did that return occur?

11 A. Early 2015.

12 Q. That is different from an
13 equity research associate?

14 A. It's a promotion.

15 Q. How long did you stay at ABR
16 this second time?

17 A. Until I was recruited by
18 Guidepoint.

19 Q. What were your duties as an
20 equity research analyst with ABR?

21 A. I analyze stocks in the
22 pharmaceutical space.

23 Q. Similar to the work you've
24 performed, previously?

25 A. Yes.

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1 V. VILLETTI

2 Q. Why did you leave ABR in the
3 first place?

4 A. I was recruited by
5 Bridgewater.

6 Q. And why did you leave
7 Bridgewater?

8 A. I was offered a promotion at
9 ABR Healthco.

10 Q. What was your compensation at
11 ABR Healthcare in that last position
12 as an analyst?

13 A. It was in six figures. I
14 can't recall, exactly.

15 Q. And how was that compensation
16 broken up? Was there a base? Was
17 there commissions?

18 A. Yes, there was a base and
19 there was a bonus.

20 Q. What was the bonus based upon?

21 A. Performance.

22 Q. How would your performance
23 analyzing stocks be measured?

24 A. Based on my output of reports.

25 Q. What point in time did you

1 V. VILLETTI

2 start being recruited by Guidepoint?

3 A. Mid 2017.

4 Q. So you're at ABR as an analyst
5 from 2015 through 2017, thereabout?

6 A. Right.

7 Q. Did you ever receive a bonus
8 from ABR as an analyst?

9 A. Yes.

10 Q. How many bonuses, if more than
11 one?

12 A. Two.

13 Q. And on what occasions? When
14 did they occur? Sorry.

15 A. End of 2015 and end of 2016.

16 Q. All right. What was the first
17 inkling that you had that you were
18 being recruited by Guidepoint?

19 A. I was contacted by a recruiter
20 from Long Ridge Partners.

21 Q. I'm sorry, which Partners?

22 A. Long Ridge Partners.

23 Q. Okay. And who is that
24 recruiter?

25 A. His name is Chirag

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1 V. VILLETTI

2 Jethanandani.

3 Q. What did this recruiter at

4 Long Ridge say to you?

5 A. He said Guidepoint is looking
6 for a Healthcare Content Specialist.

7 Q. At that point, did you know
8 what Guidepoint was?

9 A. I had heard of it.

10 Q. What have you heard?

11 A. It was an expert network.

12 Q. What was your understanding as
13 to what Guidepoint did?

14 A. Provided experts.

15 Q. To whom?

16 A. To any member of institutions.

17 Q. Experts in what field?

18 A. A verity of fields.

19 Q. Had you had any experience in
20 the healthcare field before?

21 A. Yes, as an investment
22 associate and investment analyst.

23 [sic]

24 Q. In the pharmaceutical areas?

25 A. Yes.

1 V. VILLETTI

2 Q. Did the recruiter --

3 A. I should correct that.

4 Q. Sure.

5 A. Equity associate and equity
6 analyst.

7 Q. Sure. Did the recruiter at
8 Long Ridge -- what else did the
9 recruiter at Long Ridge tell you that
10 Guidepoint was looking for in
11 addition to the Healthcare Content
12 Specialist?

13 A. Someone to head their efforts
14 in providing Healthcare Content for
15 clients.

16 Q. Had you worked with Long Ridge
17 before?

18 A. No.

19 Q. That you know, how did it come
20 that Long Ridge got your contact
21 information?

22 A. LinkedIn.

23 Q. Had you been looking for your
24 next position after -- or to move on
25 from the research analyst position at

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1 V. VILLETTI

2 ABR?

3 A. No.

4 Q. What did the recruiter from
5 Long Ridge tell you next? What would
6 be your next steps, if you were
7 listening to this Guidepoint
8 proposal.

9 A. I met with the recruiter.

10 Q. When did that occur?

11 A. June, 2017.

12 Q. What was the content of that
13 meeting?

14 A. He went over the role.

15 Q. The role at --

16 A. At Guidepoint.

17 Q. Okay. And what did he
18 describe to you that role to be?

19 A. Content Specialist and
20 Healthcare.

21 Q. Did he talk in terms of what
22 he expected in your day-to-day
23 duties?

24 A. To some extent.

25 Q. To what extent?

1 V. VILLETTI

2 A. He provided an overview.

3 Q. Of what your duties would be
4 at Guidepoint?

5 A. Yes.

6 Q. What was included in that
7 overview?

8 A. Creating content for clients,
9 putting together in-person meetings,
10 attending meetings and conferences,
11 and others I don't recall, exactly.

12 Q. Had you had any experience
13 creating healthcare content, in this
14 respect?

15 A. Yes.

16 Q. And what was that experience?

17 A. I had experience as an
18 equity associate and an
19 equity analyst.

20 Q. I'm sorry, can you just
21 explain how analyzing pharmaceutical
22 stocks gives you experience in
23 creating healthcare content?

24 A. It's the job of an
25 equity analyst or associate to

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1 V. VILLETTI

2 provide reports on companies and on
3 the greater pharmaceutical landscape
4 for whatever industries they are
5 covering.

6 Q. Had you had any experience,
7 prior to meeting with this recruiter
8 in arranging such meetings, as he
9 described?

10 A. Yes.

11 Q. In what capacity?

12 A. It was a part of my job at
13 ABR.

14 Q. During your first ten year or
15 second or both?

16 A. Both.

17 Q. Can you describe how you, say,
18 arranged meetings while you were at
19 ABR?

20 A. I don't understand the
21 question.

22 Q. When you were at ABR, one of
23 your responsibilities was to arrange
24 meetings?

25 A. Yes.

1 V. VILLETTI

2 Q. What was involved in doing
3 that?

4 A. We contacted clients and
5 contacted advisors or management
6 teams and arranged meetings.

7 Q. During your meeting with the
8 recruiter in June of 2017, did he
9 describe to you what would be the
10 next steps -- well, first, did you
11 express an interest in the position
12 at Guidepoint?

13 A. I wanted to learn more.

14 Q. What, specifically, did you
15 want to learn?

16 A. About the team, the company.

17 Q. Did your recruiter have
18 answers to those questions for you,
19 during your meeting?

20 A. He provided the name of the
21 person leading the team.

22 Q. Who was that person?

23 A. Bouker Pool.

24 MR. LICHTEN: B-O-U-K-E-R,
25 Pool.

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1 V. VILLETTI

2 Q. Was it the recruiter's idea
3 that you would contact Mr. Pool?

4 A. No. The recruiter arranged
5 everything.

6 Q. Okay. What, if anything else,
7 did the recruiter tell you about
8 Mr. Pool's team?

9 A. That it was a new team.

10 Q. Did he explain to you what
11 Guidepoint's expectations would be to
12 the Healthcare Content Specialist in
13 the new team?

14 A. Not in detail.

15 Q. So you expressed an interest,
16 at least in learning more about the
17 opportunity; the recruiter gave you
18 the name of Bouker Pool, said it was
19 a new team. Did he give you any
20 other information in response to your
21 question?

22 A. He suggested that I ask the
23 remainder of my questions from the
24 team when I met them.

25 Q. So did there come a point in

1 V. VILLETTI

2 time when you met the team?

3 A. Yes.

4 Q. Was that your immediate next
5 step in your Guidepoint process after
6 meeting the recruiter or was there
7 something in between?

8 A. I don't recall, exactly, but I
9 believe I filed or I filled a form,
10 an application form.

11 Q. Is that something online or a
12 paper?

13 A. It was a form that they
14 e-mailed me.

15 Q. From Guidepoint?

16 A. Yes.

17 Q. Who sent you the form?

18 A. The recruiter.

19 Q. From Long Ridge?

20 A. Yes.

21 Q. You filled out the form and
22 sent it back to the recruiter?

23 A. Yes.

24 Q. What happened next in the
25 Guidepoint process?

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1 V. VILLETTI

2 A. I met with the team.

3 Q. At Guidepoint's --

4 A. At Guidepoint.

5 Q. -- offices?

6 A. Yes.

7 Q. Who did you meet with?

8 A. As I recall, I met with

9 Priscilla, who is in HR. I met with

10 Bouker Pool. I think that was it.

11 Q. Do you recall when this

12 meeting occurred?

13 A. Some time after June.

14 Q. 2017?

15 A. Yes. It could have been July.

16 Q. What did you guys discuss in

17 this meeting?

18 A. The role and the company.

19 Q. What information did they give

20 you about the company?

21 A. That it's an expert network.

22 Q. What information did they give

23 you about the role they're receiving

24 to fill?

25 A. That it would be head of

1 V. VILLETTI

2 healthcare content.

3 Q. And that head of healthcare
4 content, it was your understanding
5 would be reporting to Mr. Pool?

6 A. Yes.

7 Q. What was Mr. Pool's position?

8 A. He was the Director of
9 Content.

10 Q. Was Mr. Pool responsible for
11 content across different areas of
12 expertise, other than just
13 healthcare?

14 A. Yes.

15 Q. What other areas of content
16 would Mr. Pool have directed?

17 A. I don't know.

18 Q. Certainly healthcare?

19 A. Yes. Healthcare and other
20 industries.

21 Q. Okay. Did Priscilla or
22 Bouker, the team together, did they
23 make you an offer during this June or
24 July, 2017 meeting?

25 A. No.

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1 V. VILLETTI

2 Q. What was the next step in your
3 Guidepoint recruitment application
4 process?

5 A. They asked for samples of my
6 work.

7 Q. Mr. Pool and Priscilla asked
8 for samples?

9 A. The recruiter did.

10 Q. The recruiter is still
11 involved at this point --

12 A. Yes.

13 Q. -- as a liaison?

14 Okay. And you provided those
15 work samples --

16 A. Yes.

17 Q. -- to the recruiter?

18 And what was in your work
19 samples?

20 A. I don't recall, exactly.
21 But, likely, a report, some
22 presentations we put together.

23 Q. And this would have been for a
24 current employer, a prior employer at
25 the time; do you recall?

1 V. VILLETTI

2 A. For ABR.

3 Q. Okay. So you sent these work
4 samples to the recruiter. What
5 happened next in this Guidepoint
6 recruitment of you?

7 A. I believe they did
8 reference checks.

9 Q. Did you provide references to
10 the recruiter?

11 A. Yes, and the application.

12 Q. Was this part of the form that
13 he asked you to fill out?

14 A. Yes.

15 Q. The recruiter advised you that
16 they were likely doing reference
17 checks. Did the recruiter keep you
18 up to date in any other way about the
19 recruitment process at Guidepoint,
20 after your meeting with Bouker and
21 Priscilla?

22 A. He said he'd be in touch.

23 Q. Did he eventually get back in
24 touch with you?

25 A. Yes.

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1 V. VILLETTI

2 Q. And what did he say?

3 A. They were interested in
4 extending me an offer.

5 Q. When did that conversation
6 occur, where the recruiter said that
7 Guidepoint was interested in
8 extending an offer?

9 A. I don't recall, exactly. Some
10 time in July or August.

11 Q. What else did he say? Did he
12 say that there was a certain timeline
13 to respond?

14 A. No.

15 Q. Did he explain to you what the
16 offer was?

17 A. I don't recall.

18 Q. What was your next step with
19 the recruiter or Guidepoint after
20 hearing that they were interested in
21 extending your offer?

22 A. I eventually received an
23 offer.

24 Q. From whom?

25 A. From Guidepoint.

1 V. VILLETTI

2 Q. Not through the recruiter;
3 directly from Guidepoint?

4 A. Yes.

5 Q. Who relayed that offer to you?

6 A. I believe it was Priscilla.

7 Q. How was that done?

8 A. By an e-mail.

9 Q. Do you recall when you
10 received that e-mail?

11 A. Some time in August.

12 Q. And what -- did Priscilla
13 explain the offer in that e-mail?

14 A. It had the salary. That is
15 what I recall.

16 Q. Do you recall what the salary
17 component of the offer was?

18 A. No, but we negotiated it.

19 Q. Were there any other
20 components of the offer that you
21 recall in Priscilla's e-mail?

22 A. No.

23 Q. Were there any bonus
24 components?

25 A. Yes.

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1 V. VILLETTI

2 Q. Do you recall what the bonus
3 components were?

4 A. No.

5 Q. All right. So, you said that
6 you negotiated your salary. Was that
7 done with Priscilla?

8 A. Yes.

9 Q. Had the recruiter stepped back
10 at this point? He was no longer
11 directly involved?

12 A. No, he was still involved.

13 Q. All right. And in what
14 respect?

15 A. In making sure both parties
16 were happy.

17 Q. Could you walk us through the
18 negotiations with Priscilla on your
19 salary? What was your response for
20 the initial salary component of the
21 offer?

22 A. The discussion largely
23 happened with Chirag.

24 Q. Through the recruiter?

25 A. Yes.

1 V. VILLETTI

2 Q. Okay.

3 A. We asked for more. I believe
4 I had a call with Bouker some time in
5 that period, and then I received a
6 new offer.

7 Q. And who relayed that new
8 offer?

9 A. Priscilla.

10 Q. When did that come in?

11 A. Some time in August.

12 Q. Was that also by e-mail?

13 A. Yes.

14 Q. Do you recall the salary
15 component in that offer?

16 A. It was a base of 180,
17 discretion bonus of 15, signing bonus
18 of 5.

19 Q. What was your response to that
20 offer?

21 A. I accepted the offer.

22 Q. How did those components of
23 the offer match up with what you were
24 seeking? Were they what you were
25 seeking? a little bit less?

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1 V. VILLETTI

2 A. I don't know how to answer
3 that.

4 Q. The offer included 180,000
5 base salary?

6 A. Yes.

7 Q. What were you seeking in your
8 negotiations for your base salary?

9 A. I was looking at the total
10 package.

11 Q. What total package were you
12 looking at?

13 A. Something that would be
14 comparable to what I would have made,
15 had I stayed on the south side.

16 Q. At what position?

17 A. At Health Co. or another firm.

18 Q. Okay. And what were you
19 making at ABR at that time?

20 A. I don't recall, exactly, but
21 it would have been comparable.

22 Q. Six figures with a base and a
23 bonus--

24 A. Yes.

25 Q. -- that you received twice?

1 V. VILLETTI

2 A. Yes.

3 Q. Do you recall what the
4 six-figure base was, as an analyst at
5 ABR?

6 A. It was lower than Guidepoint,
7 but the bonus was much more.

8 Q. The base at ABR -- the
9 six-figure base was lower than the
10 180 component at Guidepoint?

11 A. I believe so.

12 Q. Okay. And we talked about the
13 bonuses you received at ABR.

14 A. Yeah.

15 Q. -- one in 2015 and one in
16 2016?

17 A. Yes.

18 Q. Do you recall the amount you
19 received in 2015 for a bonus?

20 A. I don't, exactly.

21 Q. What about 2016?

22 A. I can't be sure.

23 Q. Was it based on a percentage?
24 I know we talked about the criteria
25 for it; it was output and things like

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1 V. VILLETTI

2 that. Was it based on a percentage
3 of your base?

4 A. No.

5 Q. Do you know what it was based
6 upon, other than why you would be
7 entitled to it, how they came to the
8 amount?

9 A. It was based on performance.

10 Q. Okay. So, you did accept the
11 offer as relayed by Priscilla: The
12 180, the 15 discretionary bonus. Was
13 that understood to be annual bonus?

14 A. For the first year, yes.

15 Q. And what was your
16 understanding of the bonus after the
17 first year?

18 A. We would discuss it later, but
19 there was room for growth.

20 Q. In terms of an increase in the
21 bonus amount?

22 A. Yes.

23 Q. And you accepted that offer?

24 A. Yes, but I joined at midpoint
25 in the year. So this bonus would

1 V. VILLETTI

2 have been for the remainder of the
3 year.

4 Q. Okay. When did you join
5 Guidepoint?

6 A. September.

7 Q. We're in 2017, then?

8 A. Yes.

9 Q. So it's your understanding
10 upon accepting the offer, that the
11 annual discretionary 15,000 bonus
12 would be prorated for your time in
13 joining?

14 A. No. The 15,000 was for the
15 remainder of the year.

16 Q. Okay. So it was your -- it
17 was the opposite. It was your
18 understanding that once you worked a
19 full year at Guidepoint, the bonus
20 would be more than 15?

21 A. Yes.

22 Q. Did you receive your \$5,000
23 signing bonus?

24 A. Yes.

25 Q. And at the end of 2017, did

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1 V. VILLETTI

2 you receive a bonus?

3 A. I don't recall.

4 Q. When was your last day at
5 Guidepoint?

6 A. Some time in March of 2018.

7 Q. And had you received any
8 bonuses from Guidepoint during your
9 employment?

10 A. I don't recall.

11 Q. As long as we're talking about
12 employment -- and we'll get back to
13 Guidepoint -- what did you do in
14 terms of employment, after leaving
15 Guidepoint?

16 A. I have been working on a
17 startup.

18 Q. And what's the startup?

19 A. It is a packaged food startup.

20 Q. What was the name of the
21 startup?

22 A. Kioko, K-I-O-K-O.

23 Q. When did your work at Kioko
24 start?

25 A. When I left Guidepoint

1 V. VILLETTI

2 full-time.

3 Q. Had you been working at that
4 startup, prior to March of 2018?

5 A. No. I was involved, but not
6 working on it.

7 Q. So there was some overlap
8 between your work at Guidepoint and
9 your work for this startup?

10 A. Yes.

11 Q. When did you start your
12 involvement with Kioko?

13 A. Before I joined Guidepoint.

14 Q. About when did that
15 involvement begin?

16 A. 2016.

17 Q. What is Kioko? What does it
18 do?

19 A. They produce packaged foods.

20 Q. What sorts of foods?

21 A. Snacks.

22 Q. What was your involvement with
23 Kioko starting in 2016?

24 A. I was a cofounder.

25 Q. Who was or who were the other

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1 V. VILLETTI

2 founders of Kioko?

3 A. There were a couple of other
4 people.

5 Q. And their names are?

6 A. I don't feel comfortable
7 discussing them.

8 MR. LICHTEN: Can we take
9 a break for a minute?

10 MR. GRECH: Sure.

11 (Whereupon, the witness and
12 his attorney left the room.)

13 MR. LICHTEN: The witness
14 is not willing to give those
15 names. Maybe we can save it
16 for later or ask the judge.

17 MR. GRECH: Can you make a
18 representation as to why?
19 What's the basis?

20 MR. LICHTEN: You can ask
21 her. I don't know why, really.

22 MR. GRECH: Can you read
23 back last question and answer,
24 please?

25 (Whereupon, the record was

1 V. VILLETTI

2 read by the reporter.)

3 Q. Ms. Villetti, can you explain
4 why you do not feel comfortable in
5 disclosing the names of the other
6 cofounders of Kioko?

7 A. First, because it's irrelevant
8 and second, because they had
9 full-time jobs and they may not want
10 to be associated with Kioko, and I
11 have to respect their wishes.

12 Q. They might not want to be
13 associated with Kioko?

14 A. Yes.

15 Q. Is Kioko a public company?

16 A. No.

17 Q. Does Kioko have an internet
18 presents?

19 A. Barely.

20 Q. Does Kioko sell the packaged
21 foods online?

22 A. They sell one product now.

23 Q. What product do they sell?

24 A. A protein bar.

25 MR. GRECH: Can we mark

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1 V. VILLETTI
2 that for a ruling on
3 Plaintiffs' Response to the
4 question, the other cofounders
5 of Kioko, and subject to
6 further discussion with
7 Counsel, and ultimately the
8 decision by the Court as to the
9 relevance of that question.

10 Q. Ms. Villetti, how did your
11 role with Kioko change, say, in March
12 of 2018?

13 A. I began focusing on it
14 full time.

15 Q. What sort of things were you
16 doing full time now for Kioko?

17 A. I oversaw the RND and
18 operations.

19 Q. Anything else?

20 A. No.

21 Q. Do you still serve in that
22 capacity?

23 A. Yes.

24 Q. What sort of compensation do
25 you receive from Kioko?

1 V. VILLETTI

2 A. Nothing.

3 Q. Did you inquire any other
4 employments beginning in or about
5 March of 2018, after you left
6 Guidepoint?

7 A. I have done some consulting
8 projects.

9 Q. What consulting projects have
10 you done?

11 A. A paid project for PWC and
12 I've done unpaid work.

13 Q. What is PWC?

14 A. It is a large accounting and
15 consulting firm.

16 Q. What was the paid project that
17 you did for them?

18 A. You have to be more specific.

19 Q. You did a paid project for
20 PWC?

21 A. Yes.

22 Q. What did you do for PWC?

23 A. It was a healthcare project.

24 Q. What were your
25 responsibilities in the healthcare

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1 V. VILLETTI

2 project for PWC?

3 A. I don't know much I'm allowed
4 to disclose, contractually.

5 Q. You had a contract with PWC?

6 A. As a contractor, yes.

7 MR. GRECH: Just note for
8 the record, we're probably
9 going to call for the
10 production of that contract.
11 We'll follow up in writing.

12 Q. Other than the paid project
13 for PWC, did you perform any other
14 work for compensation after
15 March, 2018?

16 A. No.

17 Q. What compensation did you
18 receive from PWC?

19 A. I had an hourly rate of 200 an
20 hour.

21 Q. For what period of time did
22 you work on this project for PWC?

23 A. It was a short project;
24 Less than three months.

25 Q. And those three months

1 V. VILLETTI

2 occurred when?

3 A. Earlier this year.

4 Q. And the project is completed?

5 A. Yes.

6 Q. What's the total compensation
7 you've received from PWC?

8 A. I don't know off the top of my
9 head.

10 Q. How many hours did you put in
11 on the project?

12 A. I can't be sure.

13 MR. GRECH: Mr. Lichten,
14 we would also likely follow up
15 with requests based upon those
16 areas, total compensation from
17 PWC. We'll follow up in
18 writing.

19 MR. LICHTEN: Sure.

20 Q. Ms. Villetti, you've
21 mentioned, I believe, other unpaid
22 work that you've done since March of
23 2018?

24 A. Yes.

25 Q. Could you describe that,

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1 V. VILLETTI

2 please?

3 A. Informal advisory for
4 startups.

5 Q. How many startups would you
6 say you've advised in the period of,
7 say, March, 2018 to date?

8 A. Three or four.

9 Q. How much of your time in that
10 period of March, 2018 to date, have
11 you spent advising the three to four
12 startups?

13 A. In terms of?

14 Q. Was it considered a full time?
15 part time?

16 A. Just advisory work, which is
17 part time.

18 Q. And you collected
19 unemployment, as well --

20 A. Yes.

21 Q. -- after leaving Guidepoint?

22 All right. Let's go back to
23 Guidepoint: I believe you said that
24 Mr. Pool would have been your
25 supervisor at Guidepoint?

1 V. VILLETTI

2 A. Yes.

3 Q. Who else did you work with at
4 Guidepoint?

5 A. There was an events team.
6 And I, occasionally, collaborated
7 with Justin Rouise. (Phonetic)

8 Q. What was Justin's title at
9 Guidepoint?

10 A. I don't know, but he focused
11 on other industries.

12 Q. Did you work with anyone in
13 particular in the events team?

14 A. There were several people.

15 Q. Who were they?

16 A. There was Jessica (phonetic),
17 who I briefly worked with because she
18 was on maternity leave; the other
19 girls were Kendall (phonetic),
20 Amrutha (phonetic), and
21 Gabby (phonetic).

22 Q. These were all members of the
23 events team?

24 A. Yes, they provided logistics.

25 Q. Logistics for the conferences?

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1 V. VILLETTI

2 A. For anything we needed.

3 Q. And then it would be fair to
4 say that you were on the
5 content team? The content side?

6 A. Yes.

7 Q. With Bouker?

8 A. Yes.

9 Q. Anyone else on the Healthcare
10 Content Team?

11 A. No -- actually,
12 Ashlee Dunston was initially a
13 healthcare content person and we
14 overlapped for some period of time.

15 Q. Your ten year with Guidepoint
16 overlapped Ashlee's?

17 A. Yes.

18 Q. In the same title?

19 A. I don't know what her title
20 was.

21 Q. When did Ashlee leave
22 Guidepoint?

23 A. End of the year.

24 Q. The end of 2017?

25 A. Yes.

1 V. VILLETTI

2 Q. Under what circumstances?

3 A. She was fired.

4 Q. Do you know why?

5 A. I believe because she was a
6 woman.

7 Q. And what led you to that
8 belief?

9 A. Based on my conversations with
10 members of her team. They were not
11 consulted.

12 Q. Not consulted about her
13 termination?

14 A. Yes.

15 Q. When you were brought on by
16 Guidepoint, was it your understanding
17 that you would be replacing Ashlee or
18 working with Ashlee?

19 A. There was little to no mention
20 of Ashlee.

21 Q. In your application and
22 interview process?

23 A. Yes.

24 Q. When did you first come to
25 learn of Ashlee?

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1 V. VILLETTI

2 A. When I was at Guidepoint.

3 Q. When you began employment?

4 A. Yes.

5 Q. And she -- Ashlee would have
6 been on the Healthcare Content Team,
7 correct?

8 A. I don't know her exact role,
9 but whatever responsibilities she
10 had, she also produced healthcare
11 content.

12 Q. Who were the other members of
13 her team that complained about not
14 being consulted -- "complained" is
15 too strong of a word -- that told you
16 they were not consulted?

17 A. I don't recall their names.

18 Q. Were these -- I'm struggling
19 to understand the other members of
20 the Healthcare team. If it was you
21 and Bouker, and there was some
22 overlap with Ashlee, were there other
23 members of the Healthcare Team at
24 that point?

25 A. No. These were people that

1 V. VILLETTI

2 reported to her, but they were not
3 healthcare content people.

4 Q. Okay. So these were
5 subordinates to Ashlee?

6 A. Yes.

7 Q. And it was your understanding
8 that they felt they should have been
9 consulted, prior to the company
10 letting Ashlee go?

11 A. Yes.

12 Q. Did you have conversations
13 with anyone else at Guidepoint as to
14 termination procedures in this
15 context, consulting with team
16 members?

17 A. I don't understand your
18 question.

19 Q. You said that Ashlee's team
20 members said they weren't consulted
21 regarding her termination?

22 A. Yes.

23 Q. Was it your understanding that
24 it was Guidepoint's policy to consult
25 with team members prior to

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1 V. VILLETTI

2 terminating someone?

3 A. I had that impression, yes.

4 Q. How did you get that
5 impression?

6 A. Based on conversations with
7 people that had been at Guidepoint
8 for longer.

9 Q. Such as?

10 A. I don't recall.

11 Q. Did you have conversations
12 like that with Bouker?

13 A. I don't recall.

14 Q. Did you have conversations
15 like that with Priscilla?

16 A. I don't recall.

17 Q. Do you recall any other
18 terminations of other employees
19 during your time at Guidepoint, other
20 than Ashlee?

21 A. No.

22 Q. How would you describe your
23 work performance at Guidepoint during
24 your time there?

25 A. Great.

1 V. VILLETTI

2 Q. And what do you base that
3 upon?

4 A. The feedback from my
5 supervisor, from the advisors, from
6 the clients, and the numbers of
7 attendees of the content I produce,
8 and conferences -- teleconferences.

9 Q. And how many conferences would
10 you have arranged during your time at
11 Guidepoint?

12 A. Conferences or
13 teleconferences?

14 Q. Conferences, in general.

15 A. I don't know, exactly.

16 Q. Teleconferences?

17 A. I don't know, exactly.

18 Q. If we're talking conferences
19 and telephone conferences, were there
20 also in-person conferences?

21 A. There were in-person meetings.

22 Q. In-person meetings, okay. And
23 how many -- strike that.

24 You would have been
25 responsible for arranging healthcare

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1 V. VILLETTI

2 content in-person meetings?

3 A. Yes, in selecting the advisors
4 and setting the agenda.

5 Q. How many in-person meetings
6 did you work on, while you were at
7 Guidepoint?

8 A. I don't know, exactly.

9 Q. You've mentioned a Jessica
10 before. You worked with her,
11 briefly?

12 A. Yes.

13 Q. What was the nature of your
14 work with Jessica?

15 A. She was in events and
16 logistics -- events planning and
17 logistics.

18 Q. How would events and the
19 content team work together?

20 A. They provided support in
21 organizing the events.

22 Q. Did Jessica work on any of the
23 events that you were responsible for?

24 A. I don't know.

25 Q. Did you receive logistic

1 V. VILLETTI

2 support for the conferences you
3 worked on?

4 A. Yes.

5 Q. Do you recall specific members
6 of the logistics team that you worked
7 with?

8 A. I worked with all of them;
9 various.

10 Q. Kendall, Amrutha, and Gabby?

11 A. Yes.

12 Q. But you don't recall,
13 specifically, working with Jessica?

14 A. No.

15 Q. And you mentioned that, at
16 some point, she went out on
17 maternity leave?

18 A. Yes.

19 Q. Do you recall when that
20 happened?

21 A. I don't know.

22 Q. Did Jessica, ultimately,
23 return to Guidepoint?

24 A. Yes.

25 Q. Do you recall when that

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1 V. VILLETTI

2 happened?

3 A. No.

4 Q. Were you aware of a change in
5 Jessica's position, while she was on
6 maternity leave?

7 A. Yes.

8 Q. What was your knowledge of
9 that?

10 A. I was told that she had been
11 demoted.

12 Q. You were told that she was
13 demoted while out on leave?

14 A. Yes.

15 Q. Demoted from what position?

16 A. I don't know the specifics.

17 Q. Do you know what position she
18 was demoted to?

19 A. No.

20 Q. Who told you that she was
21 demoted?

22 A. Bouker Pool.

23 Q. Who would have been
24 responsible for demoting Jessica?

25 A. Albert (phonetic).

1 V. VILLETTI

2 Q. Who is Albert?

3 A. Albert is the CEO of
4 Guidepoint.

5 Q. This is Albert Sebag, we're
6 talking about?

7 A. Yes.

8 Q. S-E-B-A-G?

9 A. Yes.

10 Q. What did Bouker tell you about
11 Albert's demotion of Jessica?

12 A. That she had been demoted
13 while she was on maternity leave and
14 her subordinates had been reassigned
15 to him.

16 Q. "To him" meaning?

17 A. To Bouker.

18 Q. Did you know why Jessica was
19 demoted?

20 A. No.

21 Q. When Jessica came back from
22 maternity leave, what were her
23 duties?

24 A. She provided logistics for
25 events.

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1 V. VILLETTI

2 Q. Did those duties differ in any
3 way from the duties she did before
4 she went out?

5 A. I don't know.

6 Q. Which subordinates were
7 reassigned to Bouker?

8 A. Gabby, Amrutha, and Kendall.
9 Actually, there was also
10 Sara (phonetic). I forgot Sara.
11 There was a fourth person.

12 Q. Sarah was also on the events
13 team --

14 A. Yes.

15 Q. -- at this time?

16 Were these subordinates now on
17 the Healthcare Content Team or they
18 worked for Bouker in other content
19 areas?

20 A. All content.

21 Q. Did they work with you on
22 healthcare?

23 A. Yes.

24 Q. Did there come a point in time
25 when you and Bouker sought to expand

1 V. VILLETTI

2 the team?

3 A. Yes.

4 Q. Can you tell us what efforts
5 you made to expand the Healthcare
6 Content Team?

7 A. We worked with
8 Guidepoint's HR, and recruiting
9 disorced [sic] candidates.

10 Q. What sort of position or
11 positions were you seeking to fill?

12 A. I was seeking associate for
13 myself, and another healthcare
14 content person.

15 Q. Was Ashlee gone by this time?

16 A. I think so. I'm not sure.

17 Q. Were you and Bouker leading
18 these --

19 A. Yes.

20 Q. -- these efforts to expand the
21 team?

22 Did you have any conversations
23 with Albert about this expansion?

24 A. No.

25 Q. Who gave you, sort of, the

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1 V. VILLETTI

2 instructions to expand the team?

3 A. Bouker Pool.

4 Q. Do you know whether he
5 received those instructions from
6 anyone else or this was his own
7 initiative?

8 A. As I understood it, it all
9 came from Albert Sebag.

10 Q. It's your understanding that
11 you were tasked as being one of the
12 hiring managers for the Healthcare
13 Content Strategist position?

14 A. Yes.

15 Q. Who gave you that position or
16 authority, I should say?

17 A. Bouker Pool.

18 Q. And it was your understanding
19 that you had authorization to
20 interview and hire whoever you sought
21 fit with Bouker?

22 A. Yes.

23 Q. Did there come a point in time
24 where you interviewed a Dr. Jibril?

25 A. Yes.

1 V. VILLETTI

2 Q. Who is Dr. Jibril?

3 A. She was a candidate.

4 Q. For which position?

5 A. For Healthcare Content

6 Associate, I believe. I'm not sure.

7 Q. What would she have been
8 interviewing or applying for? The
9 position of your associate or the
10 other Healthcare Content Specialist?

11 A. The Healthcare Content
12 Specialist, but she would have
13 reported to me.

14 Q. How did you come to learn of
15 Dr. Jibril?

16 A. Through Guidepoint HR.

17 Q. What's Dr. Jibril's
18 background, relevant to her potential
19 candidacy, her disposition?

20 A. She is extremely qualified as
21 an MD who has also worked for another
22 expert network.

23 Q. Do you know what Dr. Jibril's
24 specialty is, if any?

25 A. In?

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1 V. VILLETTI

2 Q. She's a medical doctor?

3 A. Yes, she is a medical doctor.

4 I believe she has a specialty in

5 OBGYN.

6 Q. For which expert network did

7 Dr. Jibril work?

8 A. I don't know the name.

9 Q. How did you come to learn

10 of -- strike that.

11 What did HR send you,

12 materials, concerning Dr. Jibril's

13 candidacy?

14 A. Her resumé.

15 Q. Anything else?

16 A. Initially, no.

17 Q. You reviewed that resumé?

18 A. Yes.

19 Q. You talked about it with

20 Bouker?

21 A. Yes.

22 Q. What were the next steps you

23 took?

24 A. They scheduled her for an

25 interview.

1 V. VILLETTI

2 Q. When did this occur?

3 A. I'm not sure.

4 Q. Did you ultimately interview
5 Dr. Jibril?

6 A. Yes.

7 Q. Did anyone else interview her?

8 A. Yes.

9 Q. Who was that?

10 A. Bouker Pool and Justin Rouise
11 and Priscilla, I believe.

12 Q. What role was Justin playing
13 in this interview?

14 A. He was a member of the
15 content team.

16 Q. We talked about the, sort of,
17 scheduling of the interview. Do you
18 recall when the actual interview of
19 Dr. Jibril occurred?

20 A. No.

21 Q. Did she have one interview?
22 more than one?

23 A. I only interviewed her once,
24 but I'm not sure how many interviews
25 she had in total.

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1 V. VILLETTI

2 Q. What was your impressions of
3 Dr. Jibril during your interview with
4 her?

5 A. She was extremely sharp and
6 knowledgeable and qualified and would
7 have made a great addition to the
8 team.

9 Q. Did you have an opportunity to
10 talk about her interview with Bouker,
11 Priscilla, and Justin?

12 A. Yes.

13 Q. What was Bouker's impression
14 of Dr. Jibril?

15 A. He had a similar impression to
16 mine and there was a consensus that
17 she was extremely qualified and a
18 great fit.

19 Q. And Priscilla felt the same
20 way?

21 A. I did not speak to Priscilla.

22 Q. Did you speak to Justin
23 about --

24 A. Yes, Justin and Bouker Pool.

25 Q. You spoke to Justin and Bouker

1 V. VILLETTI

2 about Dr. Jibril's candidacy?

3 A. Yes.

4 Q. What did Justin have to say
5 about Dr. Jibril's candidacy?

6 A. He agreed with my assessments.

7 Q. What next steps did you take
8 in terms of Dr. Jibril's candidacy
9 application for working at Guidepoint
10 after her interview?

11 A. Someone from HR was handling
12 it, a recruiter, a lateral recruiter.
13 But she did, at some point, produce
14 samples of her work and provided
15 references, I believe. And I
16 reviewed her work.

17 Q. This was a lateral recruiter
18 inhouse at Guidepoint?

19 A. Yes.

20 Q. And who was that?

21 A. I don't know his name.

22 Q. It is a "him"?

23 A. Yes, I believe.

24 Q. Was Priscilla also involved,
25 in terms of HR at this point?

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1 V. VILLETTI

2 A. Yes.

3 Q. What sort of work samples did
4 you review from Dr. Jibril?

5 A. I don't remember.

6 Q. You, at some point, were given
7 a list of her references?

8 A. No.

9 Q. Were you made aware that she
10 had provided a list of references?

11 A. Yes.

12 Q. Did you reach out to any of
13 her references?

14 A. No, HR was handling that.

15 Q. Did HR report to you on its
16 research -- sorry -- reaching out to
17 the references for Dr. Jibril?

18 A. I don't recall.

19 Q. Okay. So, you interviewed
20 her, you spoke with the recruiter,
21 there were work samples and
22 references. What were your next
23 steps concerning Dr. Jibril?

24 A. Bouker and I agreed that we
25 should extend her an offer. And we

1 V. VILLETTI

2 had been designated the hiring
3 managers, so we had the authority to
4 do so. And it was just a matter of
5 negotiation concerning her salary.

6 Q. And, again, that designation
7 of you as hiring manager was made by
8 Bouker, correct?

9 A. Yes.

10 Q. Do you know who designated
11 Bouker?

12 A. Albert Sebag.

13 Q. How did you know that?

14 A. Bouker relayed that
15 information.

16 Q. What were the components of
17 the offer that you contemplated to
18 Dr. Jibril?

19 A. I was not involved with the
20 details.

21 Q. But you and Bouker agreed that
22 an offer should be made?

23 A. Yes.

24 Q. Was an offer ultimately made
25 to Dr. Jibril?

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1 V. VILLETTI

2 A. No.

3 Q. Why not?

4 A. Because Albert Sebag
5 intervened.

6 Q. How did Mr. Sebag intervene?

7 A. He prevented us from extending
8 her an offer.

9 Q. What was Albert's involvement
10 in the Dr. Jibril application, up
11 until this point?

12 A. Nothing.

13 Q. At what point in time did he
14 become involved?

15 A. When we were prepared to
16 extend her an offer, to my knowledge.

17 Q. To your knowledge, why did
18 Albert prevent Guidepoint from
19 extending an offer to Dr. Jibril?

20 A. Because he was not a
21 hedge fund guy.

22 Q. Because Albert is not a
23 hedge fund guy?

24 A. Because Dr. Jibril is not a
25 hedge fund guy.

1 V. VILLETTI

2 Q. Dr. Jibril has no hedge fund
3 background?

4 A. Yes.

5 Q. Albert does?

6 A. No.

7 Q. Did you have conversations
8 with Albert about Dr. Jibril's
9 candidacy?

10 A. No.

11 Q. How did you come to this
12 conclusion that it was this
13 hedge fund issue that caused Albert
14 to prevent the offer extension?

15 A. Bouker Pool relayed that
16 information.

17 Q. Did Bouker have conversations
18 with Albert about Dr. Jibril?

19 A. Yes.

20 Q. If Albert doesn't have
21 hedge fund background, why was he
22 concerned whether Dr. Jibril did?

23 A. I don't know.

24 Q. Was that a requirement of the
25 position?

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1 V. VILLETTI

2 A. Not until that point.

3 Q. How many other candidates did
4 you interview for the Healthcare
5 Content Specialist that you had hoped
6 to offer Dr. Jibril?

7 A. She was the first one.

8 Q. Had you interviewed
9 any -- strike that.

10 Had you received any
11 applications for the position of your
12 associate?

13 A. Yes.

14 Q. How many applications have you
15 received or did Guidepoint receive?

16 A. I don't know.

17 Q. Did you ever interview anyone
18 for that position?

19 A. Yes.

20 Q. Who did you interview for that
21 position?

22 A. An internal candidate named
23 Liana (phonetic) Yamin.

24 Q. Do you know the spelling of
25 the last?

1 V. VILLETTI

2 A. I believe it's Y-A-M-I-N.

3 Q. Ms. Yamin, what was her
4 position at Guidepoint at the time
5 she was applying for your
6 associate position?

7 A. She was a junior person. I
8 don't know, exactly, her title.

9 Q. And you interviewed her for
10 the associate position?

11 A. Yes.

12 Q. Did you interview anyone else?

13 A. Yes.

14 Q. Who did you interview, other
15 than Ms. Yamin?

16 A. I don't remember the name.
17 Another internal candidate.

18 Q. Male or female?

19 A. Female.

20 Q. Anyone else? You had two
21 interviews. Was there a third?

22 A. No, not to my knowledge.

23 Q. Would anyone else have been
24 interviewing someone for your
25 associate position?

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1 V. VILLETTI

2 A. HR was helping, so it's
3 possible that they had.

4 Q. Was anyone else present during
5 your interview with Ms. Yamin?

6 A. No.

7 Q. The other female candidate, we
8 can't recall the name, did you
9 interview her by yourself, as well?

10 A. Yes.

11 Q. Did there come a point in time
12 when you extended an offer to either
13 of those candidates for the position?

14 A. Yes, to Liana.

15 Q. What was the result of that
16 offer being extended?

17 A. She transferred from her team
18 to our team.

19 Q. When did that -- let's start
20 with the transfer: When did that
21 transfer occur?

22 A. I don't remember.

23 Q. Did it occur before or after
24 or during your dialogue with
25 Dr. Jibril?

1 V. VILLETTI

2 A. Before.

3 Q. So at the time that you and
4 Bouker wanted to extend the offer to
5 Dr. Jibril, Ms. Yamin was already on
6 your team?

7 A. I believe she had left.

8 Q. She had joined the team and
9 then left, all within that same time
10 period?

11 A. She had left Guidepoint.

12 Q. Do you know the circumstances
13 of her departure?

14 A. She received a better offer
15 elsewhere that had a more competitive
16 salary.

17 Q. So how long did Ms. Yamin
18 serve as your associate?

19 A. I don't remember, but a few
20 months.

21 Q. Was the position you were
22 seeking to put Dr. Jibril in
23 ultimately filled?

24 A. Yes.

25 Q. Do you know who it was filled

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1 V. VILLETTI

2 by? Who took the position?

3 A. I don't know the name.

4 Q. It's your understanding that
5 it's one person?

6 A. I believe it's multiple people
7 that were hired.

8 Q. And since we are talking about
9 gender discrimination, do you know
10 the gender or breakdown of the people
11 that were hired?

12 A. I believe they are men.

13 Q. All?

14 A. No.

15 Q. When you say "multiple," do
16 you have an idea of a number?

17 A. No.

18 Q. Is it your understanding that
19 half are men? majority are men?
20 What is your understanding of the
21 breakdown?

22 A. I don't know.

23 Q. Do you know if there are any
24 women that came in to fill that
25 position?

1 V. VILLETTI

2 A. There may be women on the team
3 now. I don't know.

4 Q. Do you know in what capacity
5 that woman is on the team?

6 A. No.

7 Q. What leads you to believe that
8 Guidepoint terminated your employment
9 because of your gender?

10 A. Because of the pattern I
11 noticed at Guidepoint.

12 Q. What was that pattern?

13 A. The demotion and firing of
14 women.

15 Q. When you speak of demotion,
16 you're talking about Ashlee?

17 A. Yes.

18 Q. And there was another --

19 A. No. Jessica.

20 Q. I'm sorry; Jessica. Jessica
21 went out on maternity leave and was
22 demoted?

23 A. Yes.

24 Q. And who was the fired woman
25 that we're talking about?

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1 V. VILLETTI

2 A. Ashlee.

3 Q. Ashlee, okay.

4 A. And then my inability to hire
5 Ms. Jibril.

6 Q. What part of the demotion of
7 Jessica led you to believe that it
8 was based upon her gender?

9 A. She was on maternity leave.

10 Q. And what part of Ashlee's
11 firing did you believe was based upon
12 her gender?

13 A. The fact that it was done
14 without speaking to her subordinates
15 right before the holidays.

16 Q. We talked about Albert's
17 intervention and not wanting to hire
18 Dr. Jibril because she had no
19 hedge fund experience. In what
20 capacity does her gender -- in what
21 way does her gender play a role in
22 that?

23 A. She was not a hedge fund guy.

24 Q. You had "guy", specifically,
25 before?

1 V. VILLETTI

2 A. Yes.

3 Q. Albert is not a hedge fund guy
4 either, right?

5 A. No.

6 Q. Were there other hedge fund
7 guys at Guidepoint?

8 A. No. I don't know at
9 Guidepoint. On our team, no.

10 Q. Who is Rutwik, R-U-T-W-I-K?

11 A. I don't know what his position
12 is now.

13 Q. What is your -- who is Rutwik,
14 as far as you know?

15 A. He was a friend of Albert.

16 Q. How did you come to know
17 Rutwik?

18 A. I saw him in the office.

19 Q. Doing what?

20 A. I don't know.

21 Q. Did Rutwik work for
22 Guidepoint?

23 A. Not to my knowledge.

24 Q. Do you know what Rutwik's
25 background is?

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1 V. VILLETTI

2 A. He was a hedge fund guy.

3 Q. What were your dealings with
4 Rutwik, while you were at Guidepoint?

5 A. I was initially told that he
6 was there as a friend of Albert to
7 provide some consulting services, as
8 I recall.

9 Q. Who told you that?

10 A. Bouker Pool.

11 Q. When did Rutwik first begin
12 his involvement with Guidepoint?

13 A. I don't know.

14 Q. Was he still with Guidepoint
15 in March of 2018?

16 A. Yes.

17 Q. Did you have an opportunity to
18 work with Rutwik during your time at
19 Guidepoint?

20 A. Yes.

21 Q. In what way?

22 A. He inserted himself into our
23 team.

24 Q. The Healthcare Content Team?

25 A. Yes.

1 V. VILLETTI

2 Q. How so?

3 A. He began commenting on
4 teleconferences that we were
5 planning.

6 Q. That you and Bouker were
7 planning?

8 A. That me -- that I was
9 planning; me and the logistics team.

10 Q. What were his comments?

11 A. He had opinions on what we
12 should and shouldn't do.

13 Q. What were those opinions?

14 A. I don't recall.

15 Q. How many conferences would
16 Rutwik have offer his opinions about?

17 A. I don't remember.

18 Q. Do you recall having an
19 exchange with Rutwik about his
20 opinions, about your conferences?

21 A. Many exchanges, yes.

22 Q. How many exchanges would you
23 say?

24 A. I don't remember the exact
25 number.

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1 V. VILLETTI

2 Q. Were these in person?

3 A. In person and on the phone and
4 on e-mail.

5 Q. Did you agree with his
6 opinions? disagree?

7 A. I don't remember details. You
8 would have to be specific.

9 Q. What was the first conference
10 Rutwik offered his opinion about?

11 A. I don't remember.

12 Q. What was the last conference
13 Rutwik offered his opinion about?

14 A. I don't remember.

15 Q. Do you recall getting into an
16 argument about Rutwik, about his
17 opinions about a conference?

18 A. Yes.

19 Q. What conference was that?

20 A. I don't remember details.

21 Q. Do you recall one argument or
22 multiple arguments?

23 A. Multiple arguments.

24 Q. Do you recall any of the
25 conferences that those multiple

1 V. VILLETTI

2 arguments were about?

3 A. I can't remember off the top
4 of my head.

5 Q. Okay. Apart from the
6 conference, itself, what was the
7 nature of your arguments with Rutwik?

8 A. We were told to hear out his
9 views on what we should and shouldn't
10 do, and he increasingly started
11 acting like a manager, when he was
12 not an employee.

13 Q. Who told you that you should
14 hear his views out?

15 A. Bouker Pool.

16 Q. And it's your understanding
17 that was from Albert?

18 A. Yes.

19 Q. Was Bouker also functioning
20 under the assumption that he had to
21 hear out Rutwik?

22 A. I don't know.

23 Q. Did Rutwik offer his opinions
24 or ask to be heard out, in other
25 teams?

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1 V. VILLETTI

2 A. Yes.

3 Q. And what other teams?

4 A. I believe he also interacted
5 with the data team and sales team.
6 I don't remember the details.

7 Q. How did you learn that he was
8 interacting with the data team?

9 A. I believe it came up in
10 speaking to Bouker.

11 Q. How did you learn that Rutwik
12 was involved with the sales team?

13 A. Same.

14 Q. Through Bouker?

15 A. Yes. I should say, business
16 development, not sales.

17 Q. The business development team?

18 A. Yes.

19 Q. Is Bouker still with
20 Guidepoint?

21 A. No.

22 Q. What were the circumstances of
23 his separation?

24 A. He filed a complaint several
25 days after I filed a complaint, and

1 V. VILLETTI

2 he was also retaliated against by
3 Guidepoint.

4 Q. What was the nature of
5 Bouker's complaint?

6 A. He complained about Rutwik
7 creating a hostile environment for
8 the team.

9 Q. For Bouker's team?

10 A. Yes.

11 Q. When did Bouker file his
12 complaint?

13 A. Some time in March.

14 Q. And when did you file yours?

15 A. Three or four days before he
16 did.

17 Q. Who was on the Healthcare
18 Content Team in March of 2018?

19 A. I was.

20 Q. Along with Bouker?

21 A. Bouker was my boss. He was
22 not a healthcare person.

23 Q. What about the subordinates
24 that transferred over? Were they
25 still part of the team?

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1 V. VILLETTI

2 A. There was only one; and no,
3 she had left.

4 Q. Was this Ms. Yamin or was this
5 somebody else?

6 A. Ms. Yamin.

7 Q. She had left at this point?

8 A. Yes.

9 Q. So when we're saying
10 Healthcare Content Team in March of
11 2018, we're talking about you?

12 A. Yes.

13 Q. So Bouker complained that
14 Rutwik was creating a hostile work
15 environment for you?

16 A. For me, as well as the
17 logistics teams, which reported to
18 him.

19 Q. The logistics team also
20 reported to Bouker?

21 A. Yes. I should say, the
22 events team, but it's the same thing.

23 Q. We've been talking
24 interchangeably, the events and
25 logistics team, right?

1 V. VILLETTI

2 A. Yes.

3 Q. Jessica was on the
4 events/logistics team; that's who we
5 are talking about?

6 A. Yes. And Sara, Gabby,
7 Amrutha.

8 Q. Right. These are subordinates
9 that were transferred over?

10 A. Yes, and Kendall.

11 Q. And Kendall?

12 A. Yes.

13 Q. Was it your opinion that
14 Rutwik created a hostile work
15 environment for you?

16 A. Yes.

17 Q. How so?

18 A. He raised his voice at
19 inappropriate times. He contacted us
20 on our cells. He was a menacing
21 figure.

22 Q. Physically?

23 A. He would show up in our area.

24 Q. Had you shared these concerns
25 with Bouker?

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1 V. VILLETTI

2 A. It had come up in team
3 discussions.

4 Q. And by "team discussions," you
5 mean a conversation between you and
6 Bouker?

7 A. As well as the
8 events/logistics team.

9 Q. In what ways did you learn if
10 Rutwik was creating a hostile work
11 environment for the events team?

12 A. He was doing something similar
13 to them that I was experiencing.

14 Q. And witnessing?

15 A. Yes.

16 Q. Raising his voice?

17 A. Yes.

18 Q. Being a menacing figure?

19 A. Yes. Contacting people on
20 their cell phones.

21 Q. Was the concern there that it
22 was on the cell phone or that was it
23 outside of business hours?

24 A. Outside of business hours.

25 Q. Did you have a Guidepoint

1 V. VILLETTI

2 cell phone or did you have a
3 personal cell phone?

4 A. A personal cell phone.

5 Q. There was no Guidepoint-issued
6 cell phone?

7 A. I don't believe so.

8 Q. So you used your personal
9 cell phone while at Guidepoint, for
10 Guidepoint and personal purposes?

11 A. I don't remember.

12 Q. Did you have conversations
13 with anyone in the events team about
14 Rutwik's behavior?

15 A. In team meetings, yes.

16 Q. Who shared with you this
17 hostile-work-environment concern with
18 you in the events team?

19 A. Jessica, Sarah, Gabby, I
20 believe.

21 Q. And since Bouker had filed a
22 complaint, did you understand that
23 Bouker felt he was subject to the
24 hostile work environment, as well?

25 A. I don't know.

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1 V. VILLETTI

2 Q. What was the nature of your
3 complaint, in March of 2018?

4 A. What do you mean?

5 Q. How did you make the
6 complaint?

7 A. I sent an e-mail to Priscilla.

8 Q. This is Priscilla in HR?

9 A. Yes.

10 Q. And when did you send the
11 e-mail?

12 A. I don't remember the exact
13 date.

14 Q. It's within March of 2018?

15 A. Yes.

16 Q. Prior to Bouker's?

17 A. Yes.

18 Q. What do you recall saying to
19 Priscilla in that e-mail?

20 A. I voiced my concerns around
21 Rutwik's behavior and the treatment
22 of other women at Guidepoint.

23 Q. What were you referring to
24 when you said, "treatment of other
25 women" in this complaint to

1 V. VILLETTI

2 Priscilla?

3 A. The treatment of Jessica,
4 Ashlee and Dr. Faiza Jibril.

5 Q. What happened with respect to
6 that complaint, after you sent the
7 e-mail to Priscilla?

8 A. I met with her in her office.

9 Q. When did you meet with
10 Priscilla?

11 A. Shortly after the e-mail.

12 Q. So we're still in March of
13 2018?

14 A. I believe so.

15 Q. What did you and Priscilla
16 talk about in her office at this
17 meeting?

18 A. I relayed my concerns as
19 expressed in the e-mail about
20 sex-based discrimination at
21 Guidepoint and Rutwik.

22 Q. Was it your impression that
23 Rutwik was only raising his voice to
24 women?

25 A. It appeared so.

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1 V. VILLETTI

2 Q. And it was your impression
3 that he was only calling women
4 outside of business hours on their
5 cell phones?

6 A. I believe so.

7 Q. What was Priscilla's response
8 after you relayed these concerns
9 during this meeting?

10 A. I don't remember.

11 Q. Did she say whether that
12 Guidepoint would start an
13 investigation?

14 A. She may have.

15 Q. Was an investigation
16 ultimately conducted?

17 A. I don't know.

18 Q. Did Priscilla identify what
19 the next steps would be after your
20 meeting with her?

21 A. I don't remember.

22 Q. Did she say, "I'll get back to
23 you at a certain period of time with
24 certain information"?

25 A. I don't remember.

1 V. VILLETTI

2 Q. What was the next steps
3 concerning your complaint after this
4 meeting with Priscilla?

5 A. What do you mean by "next
6 steps"?

7 Q. Did anything else happen
8 concerning your complaint, the
9 e-mailed to Priscilla, after your
10 meeting with her in March in her
11 office?

12 A. I don't know.

13 Q. Who is James Lukban,
14 L-U-K-B-A-N?

15 A. I don't remember.

16 Q. Does he have some connection
17 to Guidepoint or this case?

18 A. I don't know.

19 Q. Who is Jenna Applebaum
20 (phonetic)?

21 A. I don't know.

22 Q. I'll have to spell this one:
23 Who is Manoj Garg? M-A-N-O-J; second
24 name, G-A-R-G.

25 A. He is my former supervisor at

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1 V. VILLETTI

2 ABR Healthco.

3 Q. What is MBO Partners?

4 A. I don't know.

5 Q. Does MBO Partners have any
6 correction with PWC?

7 A. They may.

8 Q. Do you know what that
9 connection is?

10 A. I believe they may handle some
11 processing and things like that for
12 them.

13 Q. Have you had conversation with
14 anyone -- communications with anyone
15 from MBO Partners concerning your
16 work with PWC?

17 A. Yes.

18 Q. What sort of communication?

19 A. Calls and e-mails.

20 Q. Concerning what?

21 A. The project I was doing for
22 PWC.

23 Q. The project we talked about
24 before?

25 A. Yes.

1 V. VILLETTI

2 Q. After March of 2018, and the
3 separation from Guidepoint, have you
4 applied for employment positions?

5 A. No.

6 Q. Why not?

7 A. Because I was focused on the
8 startup.

9 Q. Kioko?

10 A. Yes.

11 Q. Do you recall having
12 conversations with Bouker about your
13 job performance?

14 A. I may have.

15 Q. And it's your understanding
16 that your performance was great,
17 correct?

18 A. Yes.

19 Q. Do you think Bouker would have
20 shared that assessment?

21 A. I don't know.

22 Q. Did Albert?

23 A. Yes.

24 Q. What conversations did you
25 have with Albert about your -- what

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1 V. VILLETTI

2 communications did you have with
3 Albert about your job performance?

4 A. He had relayed positive
5 feedback to Bouker Pool, and I also
6 saw him in the office and he said, "I
7 listened to one of your calls. Great
8 job."

9 Q. Do you recall what call --
10 what that was?

11 A. No.

12 Q. Do you recall when that
13 positive feedback was relayed to you?

14 A. No.

15 Q. Do you recall the content of
16 the call that Albert complimented?

17 A. No.

18 Q. Any other communications that
19 made their way to you from Albert
20 about your job performance?

21 A. About my job performance,
22 specifically?

23 Q. Correct.

24 A. No.

25 Q. How many times have you met in

1 V. VILLETTI

2 person with Albert?

3 A. As in, been in a meeting with
4 him?

5 Q. As in, been in his physical
6 presence?

7 A. Dozens of times.

8 Q. How many meeting would you say
9 that constitutes?

10 A. One or two.

11 Q. What would you have had
12 in-person meetings with Albert about?

13 A. Well, one was when I was
14 interviewing.

15 Q. Did Albert interview you?

16 A. Yes.

17 Q. I believe we talked earlier
18 that you had met with Priscilla and
19 Bouker, right? When you were
20 interviewing?

21 A. Yeah, also Albert.

22 Q. Was that the same interview or
23 was there a second round with Albert?

24 A. I don't remember. It may have
25 been a second round.

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1 V. VILLETTI

2 Q. Perhaps, a better way to ask:
3 How many interviews did you have with
4 Guidepoint in your application
5 process?

6 A. I really don't remember. One
7 or two.

8 Q. One included Priscilla and
9 Bouker?

10 A. Yes.

11 Q. Was Albert with them?

12 A. I don't remember.

13 Q. You may have had another
14 interview with Albert?

15 A. Yes.

16 Q. In person?

17 A. Yes.

18 Q. Was anyone else present during
19 that interview?

20 A. No.

21 Q. Would your interview with
22 Albert have happened after your
23 interview with Priscilla and Bouker?

24 A. Likely so.

25 Q. Do you recall when that

1 V. VILLETTI

2 happened?

3 A. No.

4 Q. What did you and Albert talk
5 about during your interview?

6 A. My resumé and likely some
7 healthcare topics.

8 Q. And you would've had occasion
9 to have another meeting with Albert
10 during your employment with
11 Guidepoint?

12 A. I may have been in another
13 meeting that he was in.

14 Q. What was the nature of that
15 meeting?

16 A. I don't remember.

17 Q. When did that occur?

18 A. I don't remember.

19 Q. Who else was in attendance?

20 A. It would have been a group
21 meeting.

22 Q. With the healthcare team?

23 A. And others.

24 Q. The events team?

25 A. I don't remember.

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1 V. VILLETTI

2 Q. Bouker?

3 A. Don't remember.

4 Q. Other than this meeting and
5 the interview with Albert, had you
6 had any other in-person meetings with
7 Albert?

8 A. No other meetings.

9 Q. Tell me about the
10 Boston conference.

11 A. What would you like to know?

12 Q. What was the topic or topics
13 to be discussed at the Boston
14 conference?

15 A. I don't remember the
16 specifics.

17 Q. Do you recall when the -- when
18 I say "Boston conference," you know
19 what I'm talking about right?

20 A. The Boston Client Meeting.

21 Q. Alright. When did this occur?

22 A. Some time in March.

23 Q. Of 2018?

24 A. Yes.

25 Q. How many client meetings did

1 V. VILLETTI

2 you attend in person when you were at
3 Guidepoint?

4 A. I don't remember.

5 Q. One? two? dozens? hundreds?

6 A. Dozens or less -- a dozen or
7 less.

8 Q. And I misspoke before if I
9 said conference. What is the
10 difference between a conference and a
11 client meeting at Guidepoint?

12 A. I can't speak, generally. I
13 can speak specifics.

14 Q. For the healthcare team?

15 A. So, conference meetings were
16 client meetings with experts that
17 were held adjacent to conferences.

18 So there would be a medical
19 conference and there would be a
20 meeting adjacent to it that we would
21 hold with a number of clients and an
22 advisor.

23 A client meeting would have
24 been be meeting organized
25 independently of any medical

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1 V. VILLETTI

2 conference.

3 Q. So that was what was to happen
4 in Boston in March of 2018, was a
5 client meeting, separate and apart
6 from a conference with an advisor?

7 A. Yes. This meeting had an
8 advisor, but it was not related to a
9 conference.

10 Q. Okay. And you worked out of
11 Guidepoint's New York City offices,
12 correct?

13 A. Yes.

14 Q. In the dozen or less client
15 meetings that you attended at
16 Guidepoint, how many were outside of
17 New York City?

18 A. I don't remember.

19 Q. You attended the one in
20 Boston, though?

21 A. Yes. And there were others
22 outside of New York.

23 Q. That you did attend?

24 A. Yes.

25 Q. Outside of New York City or

1 V. VILLETTI

2 outside of New York State?

3 A. New York State.

4 Q. What states did you travel to
5 attend Guidepoint Client Meetings,
6 other than Massachusetts?

7 A. I could recall one in
8 California.

9 Q. And this was also a client
10 meeting?

11 A. This was a conference.

12 Q. Okay. Anywhere else?

13 A. I don't remember off the top
14 of my head.

15 Q. Did you have to seek anyone's
16 approval to attend the Boston Client
17 Meeting?

18 A. I was approached about the
19 Boston Client Meeting.

20 Q. By who?

21 A. By a member of the sales team.

22 Q. That's the same Business
23 Development Team we were talking
24 about before?

25 A. Yes.

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1 V. VILLETTI

2 Q. Who on that team approached
3 you?

4 A. I don't remember his name.

5 Q. What did you guys talk about
6 concerning the Boston Client Meeting?

7 A. That they were trying to sign
8 on BlackRock as a client and wanted
9 to have a meeting in Boston to move
10 them.

11 Q. What is BlackRock?

12 A. That is a financial
13 institution.

14 Q. What did you understand your
15 role to be in blooming BlackRock?

16 A. I was to set up and attend the
17 meeting.

18 Q. Would this have been something
19 you spoke about with Bouker?

20 A. Yes, Bouker and Mike
21 Ferrari (phonetic), the head of
22 Business Development, were both
23 aware.

24 Q. Was Mike Ferrari the
25 business development team member that

1 V. VILLETTI

2 you spoke with or it was someone
3 else?

4 A. Someone else.

5 Q. Someone on his team?

6 A. Yes.

7 Q. Did Bouker or Mike attend the
8 Boston meeting?

9 A. No.

10 Q. Did anyone else from
11 Guidepoint attend the Boston meeting?

12 A. Yes.

13 Q. Who?

14 A. I don't remember.

15 Q. One person? more than one?

16 A. One or two.

17 Q. Do you recall what teams they
18 represented?

19 A. I don't remember.

20 Q. Were you the only one from the
21 Healthcare Content Team?

22 A. Yes.

23 Q. Was anyone else from
24 Business Development there?

25 A. I don't remember.

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1 V. VILLETTI

2 Q. Would you have had to have
3 sort Bouker's authorization to attend
4 the client meeting in Boston?

5 A. Yes.

6 Q. Did you?

7 A. Yes.

8 Q. And what did Bouker say?

9 A. "Yes. Help Mike Ferrari."

10 Q. Approved?

11 A. Yes.

12 Q. At some point in time, you
13 learned that Albert did not want you
14 at the Boston conference; is that
15 correct -- the Boston meeting?

16 A. Yes.

17 Q. And how did you learn of that?

18 A. He called my cell phone that
19 morning.

20 Q. While you were in Boston?

21 A. Yes.

22 Q. How long was the Boston Client
23 Meeting intended to last?

24 A. Just a day.

25 Q. So he called you that morning?

1 V. VILLETTI

2 A. Yes.

3 Q. Did you take the call? Did it
4 go to voicemail?

5 A. I took the call.

6 Q. Okay. And what did Albert say
7 on that call?

8 A. He yelled at me that I should
9 be in New York and I should leave the
10 meeting as soon as it's over and
11 return to New York.

12 Q. Had Albert ever called you on
13 your cell phone before?

14 A. No.

15 Q. What did you say in response
16 to Albert when he said that you
17 should be in New York and you need to
18 leave the meeting as soon as
19 possible?

20 A. "Okay."

21 Q. And did you?

22 A. Yes.

23 Q. Had you flown up to Boston or
24 driven? How did you get there?

25 A. I don't remember.

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1 V. VILLETTI

2 Q. How did you get home?

3 A. I don't remember.

4 Q. At Guidepoint, did you need to
5 submit expense reports for your
6 traveling?

7 A. Yes.

8 Q. Did you submit an expense
9 report for the Boston Client Meeting?

10 A. I'm sure I did.

11 Q. Was it paid?

12 A. Bouker would have approved it.

13 Q. Do you recall being reimbursed
14 for your expenses for the Boston
15 trip?

16 A. Yes.

17 Q. So, Albert says, "You should
18 be in New York. I want you to leave
19 the Boston meeting as soon as you
20 can." And you say, "okay".

21 Did you have any other
22 conversations with Albert about the
23 Boston Client Meeting?

24 A. Beyond the phone call?

25 Q. Yes.

1 V. VILLETTI

2 A. No.

3 Q. E-mail?

4 A. Yes.

5 Q. What did you say to Albert by
6 e-mail?

7 A. He repeated what he had said
8 on the phone, and I said, "okay".

9 Q. In the call or the e-mail, did
10 Albert explain why you should be in
11 New York City and that you needed to
12 leave the Boston meeting?

13 A. I don't recall.

14 Q. Did you share with Albert that
15 you had talks with Business
16 Development and Bouker about you
17 attending the Boston meeting?

18 A. Yes.

19 Q. And what did you tell him?

20 A. That the trip had been
21 approved.

22 Q. What was Albert's response to
23 that?

24 A. I don't remember.

25 Q. You mentioned another trip to

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1 V. VILLETTI

2 California, correct?

3 A. Yes.

4 Q. And that was for a conference?

5 A. Yes.

6 Q. Would you have had to seek
7 anyone's approval to attend that
8 conference?

9 A. Bouker Pool.

10 Q. I'm assuming you flew to
11 California?

12 A. Yes.

13 Q. When did the California
14 conference occur, in relation to the
15 Boston meeting?

16 A. Before.

17 Q. Do you recall when it
18 occurred?

19 A. No.

20 Q. Did you have any conversations
21 with Albert about your attendance at
22 the California conference?

23 A. No.

24 Q. What was the nature of the
25 California conference?

1 V. VILLETTI

2 A. I don't remember.

3 Q. Are you seeking reinstatement
4 with Guidepoint?

5 A. Yes.

6 Q. Why?

7 A. I like my job and I'm good at
8 it.

9 Q. Who is running the
10 Healthcare Content Team now?

11 A. I believe Rutwik.

12 Q. So you would want to go back
13 and work with Rutwik?

14 A. Yes.

15 Q. And you would want to go back
16 and work for Albert?

17 A. Yes.

18 MR. GRECH: It's 12:00
19 now. I could keep going, but
20 if anyone needs a break -- a
21 five-minute break?

22 MR. LICHTEN: How much
23 longer do you think you have?

24 MR. GRECH: Until 2:00.

25 MR. LICHTEN: So I think w

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1 V. VILLETTI

2 should just go now, right? Do

3 you need a break?

4 THE WITNESS: No.

5 MS. SMITH: I need a

6 break.

7 MR. GRECH: Okay. Let's

8 take five minutes.

9 (Whereupon, a recess was
10 taken at this time.)

11 MR. GRECH: Can you read
12 back the last question and
13 answer, please?

14 (Whereupon, the record was
15 read by the reporter.)

16 Q. Ms. Villetti, have you
17 experienced hostile work environments
18 in any of your other places of
19 employment?

20 A. No.

21 Q. Any gender discrimination in
22 any of your other places of
23 employment?

24 A. No.

25 Q. Have you ever commenced a

1 V. VILLETTI

2 litigation against a prior employer?

3 A. No.

4 Q. As cofounder of Kioko, do you
5 have, say, an ownership interest in
6 the company?

7 A. Yes.

8 Q. Do you earn a portion of
9 profits?

10 A. There are no profits, but yes.

11 Q. Just asking, how are you
12 supporting yourself in the time
13 period between the Guidepoint
14 separation and to date?

15 A. Savings.

16 Q. We talked about Justin Rouise
17 before, remember?

18 A. Yes.

19 Q. Did he work with Rutwik?

20 A. I don't know.

21 Q. Did you have talks with Justin
22 about Rutwik?

23 A. Possibly.

24 Q. What would you have talked
25 about?

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1 V. VILLETTI

2 A. His behavior and demeanor.

3 Q. Rutwik's yelling and calling
4 people and menacing behaviors?

5 A. Yes.

6 Q. And you spoke about that with
7 Justin?

8 A. Perhaps, yes.

9 Q. Did Justin have a similar
10 impression of Rutwik?

11 A. I don't know.

12 Q. Did Justin tell you he was --
13 that Rutwik was doing the same things
14 to him?

15 A. I don't recall.

16 Q. And, again, what was Justin's
17 title at Guidepoint?

18 A. I don't know.

19 Q. Would he have reported to
20 Bouker?

21 A. Yes.

22 Q. So when Bouker says, I'm
23 complaining on behalf of my team, is
24 he also complaining on behalf of
25 Justin?

1 V. VILLETTI

2 A. I don't know.

3 Q. But you understood Bouker's
4 complains to be on behalf of his
5 team, correct?

6 A. Yes.

7 Q. And his team would have been
8 you?

9 A. Yes.

10 Q. And maybe at that time
11 Ms. Yamin?

12 A. No. Ms. Yamin was gone.

13 Q. Gone? Okay. On behalf of the
14 events and logistics team?

15 A. Yes.

16 Q. And on behalf of Justin?

17 A. I don't know, but, yes,
18 likely.

19 Q. Were there any other
20 individuals or teams that Bouker
21 would have been responsible for?

22 A. I don't believe so.

23 Q. Any male members of the
24 events/logistics team at the time?

25 A. No.

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1 V. VILLETTI

2 Q. What did Justin do?

3 A. He produced content for other
4 sectors, including consumer and tech.

5 Q. So is there a consumer
6 contents team or is there just an
7 other content team at your time
8 there?

9 A. There was one content team.
10 People just covered different
11 verticals.

12 Q. Was there a vertical for
13 consumer and tech or was there
14 healthcare and then everything else?

15 A. I don't know.

16 Q. Do you know if Guidepoint
17 consulted with any members of your
18 team, prior to termination?

19 A. I don't know.

20 Q. Did anyone consult with you,
21 prior to Guidepoint separating from
22 Bouker?

23 A. No. I don't remember.

24 Q. When did Bouker separate from
25 Guidepoint?

1 V. VILLETTI

2 A. The same day I did.

3 Q. Do you know if anyone else was
4 consulted regarding Bouker's
5 termination?

6 A. I don't know.

7 Q. Who terminated Bouker?

8 A. I believe Albert.

9 Q. And who made the decision to
10 terminate your employment with
11 Guidepoint?

12 A. I was told about the decision
13 by Priscilla. I don't know who made
14 the decision.

15 Q. How did Priscilla tell you
16 about that decision?

17 A. She called me into her office.

18 Q. When did this occur?

19 A. I don't remember the exact
20 date.

21 Q. After your e-mail to
22 Priscilla?

23 A. Yes.

24 Q. After your meeting with
25 Priscilla about your e-mail?

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1 V. VILLETTI

2 A. Yes.

3 Q. Some time in March of 2018?

4 A. Likely, yes.

5 Q. What did you and Priscilla
6 talk about during that meeting?

7 A. We talked about the sex
8 discrimination that I was observing
9 at Guidepoint.

10 Q. Was this in the meeting in
11 which she conveyed the decision to
12 terminate?

13 A. No.

14 Q. So you had sent Priscilla an
15 e-mail?

16 A. Yes.

17 Q. And you had a meeting with
18 Priscilla about the e-mail?

19 A. Yes.

20 Q. Some time after that,
21 Priscilla calls you in that office?

22 A. A few days after, yes.

23 Q. So in that meeting a few days
24 after, what did you and Priscilla
25 talk about?

1 V. VILLETTI

2 A. She simply relayed that I was
3 being terminated.

4 Q. Do you have an Employment
5 Contract with Guidepoint?

6 A. I believe I did.

7 Q. Did you understand that to be
8 at-will employment?

9 A. Yes.

10 Q. Did Priscilla share with you
11 any reasons for the termination?

12 A. I don't remember.

13 Q. Did you ask her why you were
14 being terminated?

15 A. I may have.

16 Q. What did you ask her?

17 A. I don't remember.

18 Q. Did Priscilla give you an idea
19 of when your last, effective date of
20 employment would be?

21 A. I believe it was that day.

22 Q. Do you recall what day of the
23 week that was?

24 A. No.

25 Q. How were you paid by

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1 V. VILLETTI

2 Guidepoint? Was it every two weeks?
3 once a month?

4 A. I believe every two weeks,
5 direct deposit.

6 Q. Were you paid for all the work
7 that you had done for Guidepoint?

8 A. Yes.

9 Q. Did you discuss anything else
10 with Priscilla in that meeting?

11 A. Which meeting?

12 Q. The meeting in which you were
13 terminated.

14 A. No. She said it had been a
15 pleasure to work with me.

16 Q. What did you do after you had
17 this meeting with Priscilla?

18 A. I believe it was at the end of
19 the day, so I packed my stuff and
20 left.

21 Q. Did you talk about this with
22 Bouker?

23 MR. LICHTEN: That day?

24 MR. GRECH: Fair.

25 Q. After your meeting with

1 V. VILLETTI

2 Priscilla, the end of the day you
3 packed up. That day, did you speak
4 with Bouker?

5 A. I don't think so.

6 Q. Did there come a point in time
7 that you did speak with Bouker about
8 your termination?

9 A. I believe I called him maybe a
10 few weeks after.

11 Q. That was the first time you
12 spoke to Bouker about your
13 termination?

14 A. Yes.

15 Q. And he had already been
16 terminated at that point, as well?

17 A. We were terminated
18 simultaneously.

19 Q. Right. So when did you learn
20 that Bouker had also been terminated?

21 A. When I walked back to my desk
22 to pack my things, Justin had
23 informed me that Bouker had also been
24 terminated.

25 Q. Did you talk with Justin about

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1 V. VILLETTI

2 your termination?

3 A. Not in detail, no.

4 Q. What did you talk about with
5 Justin?

6 A. That day?

7 Q. About your termination that
8 day, yes.

9 A. I just told him that I've been
10 terminated.

11 Q. What did he say?

12 A. "That is awful."

13 Q. Did Justin give you a reason
14 or his understanding of the reason
15 why Bouker was terminated?

16 A. No.

17 Q. And you mentioned you had a
18 desk in Guidepoint's office?

19 A. Yes.

20 Q. Did Justin also have a desk?

21 A. Yes.

22 Q. Was it near yours?

23 A. Yes.

24 Q. Was it near Bouker's?

25 A. Yes.

1 V. VILLETTI

2 Q. Other than Justin that day,
3 did you speak with anyone else at
4 Guidepoint about your termination?

5 A. No.

6 Q. Between that day and your talk
7 with Bouker a few weeks later, did
8 you speak with anyone else at
9 Guidepoint about your termination?

10 A. No.

11 Q. And I'm sorry, you called
12 Bouker or he called you?

13 A. I don't remember.

14 Q. You guys spoke on the phone a
15 few weeks after you were both
16 terminated?

17 A. Yes.

18 Q. And what did you talk about?

19 A. Just that we've both been
20 terminated and asked him how he was
21 doing.

22 Q. Okay. Did Bouker share with
23 you any reasons why he felt he was
24 terminated?

25 A. Yes. He was terminated in

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1 V. VILLETTI

2 retaliation for the letter he
3 submitted under the Discrimination
4 and Harassment Policy at Guidepoint.

5 Q. Bouker said that to you in
6 this conversation?

7 A. I was aware of the letter,
8 yes.

9 Q. Bouker said, "I was fired in
10 retaliation from my letter"?

11 A. Yes.

12 Q. Did you talk with Bouker about
13 the reasons you felt you were
14 terminated?

15 A. I believe so, yes.

16 Q. What did you share those
17 reasons -- what were those reasons
18 that you shared with Bouker?

19 A. That I had filed a complaint
20 about sex-based discrimination at
21 Guidepoint and because I'm a woman.

22 Q. Did Bouker sue Guidepoint?

23 A. I don't know.

24 MR. GRECH: Off the record
25 for a second, please.

1 V. VILLETTI

2 (Whereupon, a discussion was
3 held off the record.)

4 Q. Ms. Villetti, had you ever
5 complained about Bouker Pool to
6 Guidepoint?

7 A. Yes.

8 Q. What was the nature of that
9 complaint?

10 A. He had long absences from the
11 office.

12 Q. Did you have a set schedule at
13 Guidepoint, when you were expected to
14 be in the office?

15 A. Yes.

16 Q. What was that schedule?

17 A. I don't remember the
18 specifics.

19 Q. You were Monday through
20 Friday?

21 A. Yes.

22 Q. 9:00 to 5:00? 10:00 to 6:00?

23 A. Something along those lines.

24 Q. And I'm sure because of the
25 type of work that you did, you would

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1 V. VILLETTI

2 have work outside of those hours too,
3 as well?

4 A. Lots of work outside those
5 hours.

6 Q. You're not collecting overtime
7 at Guidepoint?

8 A. No.

9 Q. What were -- what hours were
10 Bouker -- during which hours was
11 Bouker expected to be at Guidepoint?

12 A. I don't know.

13 Q. But you observed his long
14 absences from the office?

15 A. Yes.

16 Q. And why was that of certain?

17 A. What do you mean?

18 Q. You had made a complaint about
19 it?

20 A. Yes.

21 Q. To whom?

22 A. To Priscilla and to
23 John Campanella (phonetic) who is
24 CFO.

25 Q. And Priscilla is HR that we

1 V. VILLETTI

2 talked about before?

3 A. Yes.

4 Q. How did you make this
5 complaint about Bouker to Priscilla
6 and John?

7 A. In, mostly, verbal
8 discussions.

9 Q. When did these discussions
10 occur?

11 A. I don't remember.

12 Q. What did you tell them?

13 A. That Bouker was frequently
14 absent in the office and he had long
15 vacations.

16 Q. Did you take vacations when
17 were you at Guidepoint?

18 A. I don't recall doing so. I
19 may have.

20 Q. I'm assuming the point here
21 was that Bouker's absence was
22 affecting your work; is that correct?

23 A. Affecting the teams work.

24 Q. How so?

25 A. The team was lacking

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1 V. VILLETTI

2 leadership.

3 Q. Who was on the team at the
4 time of Bouker's extended absence?

5 A. Myself, Justin Rouise,
6 Jessica, and then Kendall, Gabby,
7 Sara and Amrutha.

8 Q. So we're talking content and
9 we're talking logistics?

10 A. Yes.

11 Q. And Justin would have fallen
12 under the contents team, although not
13 healthcare?

14 A. Yes.

15 Q. Did you have talks with any of
16 those other team members about
17 Bouker's long absences?

18 A. Justin.

19 Q. What did you talk about with
20 Justin concerning Bouker's absences?

21 A. That it was not great for the
22 team.

23 Q. Did you have any other reason
24 to complain about Bouker to Priscilla
25 and John, other than this attendance

1 V. VILLETTI

2 and absence issue?

3 A. I don't remember.

4 Q. Did you complain about Bouker
5 to anyone else at Guidepoint for any
6 other reason?

7 A. I don't remember.

8 Q. What, if anything, did
9 Priscilla and John say to you in
10 response to this complaint about
11 Bouker's long absences?

12 A. I don't recall.

13 Q. Do you recall any changes in
14 Bouker's attendance after this
15 meeting or this conversation?

16 A. I don't believe so.

17 Q. Do you recall Bouker's
18 attendance being affected by these
19 long absences through, say, March of
20 2018?

21 A. Yes.

22 Q. Did you confer with Bouker
23 about work-related issues while he
24 was on these long absences?

25 A. I would say, we tried to get a

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1 V. VILLETTI

2 hold of him.

3 Q. You tried, meaning it was not
4 always successfully?

5 A. Yes.

6 Q. Was he supposed to be
7 available to you by cell phone or
8 e-mail?

9 A. He had expressed that he would
10 try to be available, but he was
11 sometimes off the grid.

12 Q. On how many occasions do you
13 recall Bouker being off the grid?

14 A. Several occasions.

15 Q. While at Guidepoint, were you
16 excepted to maintain a call schedule?

17 A. What do you mean?

18 Q. How did you reach out to
19 potential clients?

20 A. How did I reach out to
21 clients?

22 Q. Yes. Was there an expectation
23 that you made a certain number of
24 calls or certain number of e-mails
25 per day?

1 V. VILLETTI

2 A. There was no certain number or
3 metric, no.

4 Q. Would you have had a call
5 scheduled with Guidepoint that Bouker
6 managed for you?

7 A. The calls went into a schedule
8 as we scheduled them, which was then
9 communicated with the clients, so we
10 can RSVP.

11 Q. Was Bouker responsible for
12 managing that call schedule or did it
13 sort of just happen on its own?

14 A. We had weekly meetings where
15 we discussed what everyone was doing.

16 Q. And who had these weekly
17 meetings?

18 A. The logistics and contents
19 team.

20 Q. So Bouker is running these
21 meetings?

22 A. Yes.

23 Q. What did you discuss about the
24 calls or call scheduling during these
25 meeting?

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1 V. VILLETTI

2 A. We discussed potential topics,
3 potential advisors, the scheduling
4 timeframe, and who would be assigned
5 to cover them from the logistics
6 team.

7 Q. We had talked about your
8 e-mail to Priscilla about Rutwik and
9 the hostile work environment. Have
10 you made any other complaints about
11 similar matters while you were at
12 Guidepoint?

13 A. About Rutwik or about --

14 Q. Let's start with Rutwik. Have
15 you made any other complaints about
16 Rutwik, other than your e-mail to
17 Priscilla?

18 A. Yes.

19 Q. And what was that? How was
20 that complaint made?

21 A. I had verbally complained to
22 Bouker Pool and to Priscilla.

23 Q. Was this before or after your
24 e-mail to Priscilla about Rutwik?

25 A. Before.

1 V. VILLETTI

2 Q. And this was to Bouker and
3 Priscilla together or separate?

4 A. Separate.

5 Q. Was there anyone else that you
6 made verbal complaints about Rutwik
7 to?

8 A. We had discussions about him
9 in the team.

10 Q. Would Rutwik attend the team
11 meetings?

12 A. Not generally, no.

13 Q. On occasion, he would?

14 A. He may have sat in one or two.

15 Q. Probably not the ones you were
16 complaining about him, though?

17 A. Likely not.

18 Q. What did you explain in
19 conversation to Bouker and Priscilla
20 about Rutwik and your concerns with
21 him?

22 A. That his role was unclear and
23 that he seemed to overstep
24 boundaries, frequently.

25 Q. What sort of boundaries would

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1 V. VILLETTI

2 Rutwik overstep?

3 A. Boundaries of professional
4 conduct and his role as an advisor,
5 not as a manager.

6 Q. What, if anything, did Bouker
7 or Priscilla say to you in these
8 conversations about Rutwik?

9 A. Bouker agreed. I don't recall
10 what the conversation with Priscilla
11 would have been. Likely, that she
12 would look into it.

13 Q. And these would have been
14 separate conversations with Bouker,
15 separate from Priscilla about Rutwik?

16 A. Yes.

17 Q. Did you ever speak to Rutwik,
18 himself, about this behavior of
19 overstepping boundaries?

20 A. Yes.

21 Q. How did you have those
22 communications with Rutwik?

23 A. I politely voiced by concerns
24 both by e-mail and in person.

25 Q. To Rutwik?

1 V. VILLETTI

2 A. Yes.

3 Q. Do you recall when you would
4 have spoken to Rutwik in person about
5 your concerns about his behavior?

6 A. I don't exactly know.

7 Q. On how many occasions would
8 you have spoken to Rutwik about this
9 issue?

10 A. Two or three times, at least.

11 Q. And you also sent him e-mails
12 about this issue?

13 A. Yes, I consider that a part of
14 the two to three times.

15 Q. Okay. So two to three total
16 in-person conversations and e-mails?

17 A. Yes.

18 Q. Do you recall when you would
19 have sent an e-mail to Rutwik?

20 A. I don't remember, exactly.

21 Q. Would this have been e-mailed
22 directly to Rutwik or copied to
23 someone else?

24 A. Directly to Rutwik.

25 Q. Speaking first about the

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1 V. VILLETTI

2 in-person meetings, what was Rutwik's
3 response when you raised these
4 concerns with him?

5 A. He said that he was the boss
6 of me and everyone else there.

7 Q. Okay. Did he say anything
8 else?

9 A. I am to do what he tells me to
10 bleeping do, when he tells me to
11 bleeping do it.

12 Q. Does the bleeping start with
13 an F?

14 A. Yes.

15 Q. Would Rutwik often speak in
16 profanities in the office?

17 A. When he lost his temper.

18 Q. How often would Rutwik lose
19 his temper?

20 A. I don't know.

21 Q. Did he lose it with you?

22 A. Yes.

23 Q. On what occasions?

24 A. On several occasions.

25 Q. Had he used profane language

1 V. VILLETTI

2 with you, other than this instance
3 that we've just talked about?

4 A. He may have.

5 Q. Do you recall when?

6 A. No.

7 Q. In what circumstance?

8 A. In-person conversations.

9 Q. And so the communication that
10 he was the boss of you and everyone
11 and you were to do what he bleeping
12 says, that was in person?

13 A. Yes.

14 Q. Okay. And what was your
15 response to that?

16 A. I believe I was in shock, so
17 I'm not sure what I responded.

18 Q. After Rutwik had made that
19 communication to you, did you follow
20 up with anyone about your concerns
21 with his role and seeking clarity on
22 that?

23 A. Yes.

24 Q. Who did you speak with?

25 A. Bouker.

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1 V. VILLETTI

2 Q. And what did you and Bouker
3 talk about concerning Rutwik's role?

4 A. That neither of us really knew
5 what he was doing there.

6 Q. Did Bouker tell you he would
7 look into it? What was supposed to
8 be the next steps with that concern?

9 A. I imagine so.

10 Q. You imagine that he would have
11 said that?

12 A. I imagine he would have looked
13 into it.

14 Q. And it's your understanding
15 that Rutwik is still at Guidepoint
16 today?

17 A. Yes.

18 Q. Okay. So we have talked about
19 some complaints about Rutwik. Let's
20 now focus about, sort of, other
21 component of your complaint to
22 Priscilla in the e-mail, which was
23 hostile work environment or maybe
24 even gender-based discrimination.

25 Did you have any other

1 V. VILLETTI

2 complaints of gender-based
3 discrimination while at Guidepoint?

4 A. What do you mean?

5 Q. In your e-mail to Priscilla,
6 you spoke about the treatment of the
7 play on maternity leave, you talked
8 about termination, and you talked
9 about Dr. Jibril?

10 A. Yes.

11 Q. Prior to that, had you voiced
12 any gender-based discrimination
13 complaints to anyone at Guidepoint?

14 A. Yes, to Bouker Pool.

15 Q. Okay. And when did you do
16 that?

17 A. I did it when each of those
18 incidents occurred. I complained
19 when Jessica was on maternity leave
20 and they did what they did -- when
21 Guidepoint what they did.

22 I complained when they fired
23 Ashlee. And I complained when they
24 wouldn't allow me to hirer
25 Dr. Jibril.

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1 V. VILLETTI

2 Q. So you made these complaints,
3 sort of, contemporaneously to Bouker?

4 A. Yes.

5 Q. All right. Let's talk about
6 Jessica first: What was Bouker's
7 response when you voiced your
8 concerns about Jessica?

9 A. That he agreed.

10 Q. With what?

11 A. With the fact that she was
12 being mistreated because she was on
13 maternity leave.

14 Q. And did Bouker tell you he
15 would take any steps after you shared
16 that complaint with him --

17 A. I don't remember.

18 Q. -- concerning Jessica?

19 A. I don't remember.

20 Q. Well, Jessica came back,
21 right?

22 A. She did.

23 Q. Then she was still on a team
24 that reported to Bouker?

25 A. Yes.

1 V. VILLETTI

2 Q. Did she experience any
3 decrease in compensation that you are
4 aware of?

5 A. I heard that she had not been
6 given her bonus or it had been
7 reduced.

8 Q. And you talked with Bouker
9 about your concerns about Ashlee?

10 A. Yes.

11 Q. What was his response to those
12 concerns?

13 A. That it was entirely Albert's
14 decision.

15 Q. To terminate Ashlee?

16 A. In each of those instances.

17 Q. So stepping back, it was
18 Albert's -- Bouker told you that it
19 was Albert's decision to demote
20 Jessica?

21 A. Yes, he was in meetings when
22 that was discussed.

23 Q. Bouker was in meetings,
24 presumingly, with Albert when this
25 was discussed?

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1 V. VILLETTI

2 A. Yes.

3 Q. And Bouker also shared with
4 you that it was Albert's decision to
5 terminate Ashlee?

6 A. Yes.

7 Q. Did Bouker share with you
8 Albert's reasons?

9 A. They told me I was to take
10 over everything from Ashlee. That is
11 all I knew.

12 Q. So when you had spoken to
13 Bouker about your concerns about
14 Ashlee's termination, one of Bouker's
15 responses to you was that you were
16 going to take over Ashlee's work; is
17 that correct?

18 A. Yes. They said that they
19 would fire her as soon as I was ready
20 to take over everything, and I voiced
21 a great discomfort with that.

22 Q. Who told you that they were
23 going to fire Ashlee as soon as you
24 were ready?

25 A. Bouker Pool.

1 V. VILLETTI

2 Q. And Bouker said they would
3 fire Ashlee as soon as you were
4 ready?

5 A. Yes. Albert would fire Ashlee
6 as soon as I was ready to take over.

7 Q. Did you understand what they
8 meant by "ready to take over"?

9 A. Yes.

10 Q. What was your understanding?

11 A. That I had a good grasp on the
12 conferences and teleconferences, part
13 of what she was handling when I got
14 there.

15 Q. When did you feel you required
16 that good grasp?

17 A. A few months after I got
18 there.

19 Q. And when was Ashlee let go?

20 A. I believe in December.

21 Q. Around the holidays, right,
22 you had said?

23 A. Yes.

24 Q. And you also spoke with Bouker
25 about your concerns about Dr. Jibril?

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2 A. Yes.

3 Q. And it was your belief that an
4 offer was not extended because of
5 Dr. Jibril's gender?

6 A. Yes.

7 Q. And you shared that with
8 Bouker?

9 A. Yes.

10 Q. And what did Bouker say?

11 A. He agreed with that
12 assessment.

13 Q. Based upon what you said
14 before, I'm assuming Bouker also said
15 that it was Albert's decision not to
16 hire Dr. Jibril?

17 A. Correct.

18 Q. What else, if anything, did
19 Bouker say at that time about the
20 decision not to hire Dr. Jibril?

21 A. That he was upset about the
22 decision.

23 Q. Bouker was upset?

24 A. Yes, because Dr. Jibril would
25 have made a fantastic addition to the

1 V. VILLETTI

2 team.

3 Q. Who coined the term "hedge
4 fund guy"? Was that a Bouker term?

5 A. Albert term.

6 Q. That's an Albert term? Does
7 Albert use that term with you about
8 describing people?

9 A. I haven't had that
10 conversation with him. It was
11 discussed with Bouker Pool.

12 Q. That Albert would describe
13 certain people as or not a hedge fund
14 guy?

15 A. Yes.

16 Q. So you spoke with Bouker about
17 your concerns about Jessica, Ashlee,
18 and Dr. Jibril?

19 A. Yes.

20 Q. Did you speak with anyone else
21 about those concerns, other than
22 Bouker?

23 A. With Justin.

24 Q. Okay. About those three
25 instances, you spoke about it with

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1 V. VILLETTI

2 Justin?

3 A. I believe so, yes.

4 Q. Okay. And when did you speak
5 with Justin? Let's take Jessica
6 first.

7 A. When it was occurring.

8 Q. Okay. When she was out on
9 leave?

10 A. Yes.

11 Q. How was that communication
12 made known to you when Ashlee [sic]
13 was out on leave when she would be
14 demoted on her maternity?

15 A. Jessica.

16 Q. Jessica told you?

17 A. No, you're mixing up Jessica
18 and Ashlee.

19 Q. Oh, I'm sorry. How was the
20 communication made known to you that
21 Jessica would be demoted when Jessica
22 was out?

23 A. Bouker Pool communicated that.

24 Q. And around that time, you had
25 a conversation with Justin?

1 V. VILLETTI

2 A. Yes.

3 Q. Okay. What did you and Justin
4 talk about concerning Jessica?

5 A. That we were uneasy with how
6 they were handling that.

7 Q. And Justin was also uneasy?

8 A. I believe so.

9 Q. Did you share with him your
10 impression that this was because
11 Jessica was on maternity leave?

12 A. It was clear that it was
13 because Jessica was on
14 maternity leave.

15 Q. And you made that clear
16 assumption known to Justin?

17 A. Yes.

18 Q. Did he share that assumption?

19 A. Yes. It was relayed by Bouker
20 that that was the reason.

21 Q. Bouker believed that Jessica
22 was demoted because she took
23 maternity leave?

24 A. Bouker heard that from Albert.

25 Q. Other than Jessica, how many

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1 V. VILLETTI

2 employees went out on maternity leave
3 while you were at Guidepoint?

4 A. There was also someone named
5 Alyssa (phonetic), I believe, or
6 Alisa (phonetic). She was doing
7 PR market work for Guidepoint.

8 Q. And you worked for Guidepoint
9 around the same time as Alyssa or
10 Alisa?

11 A. Yes.

12 Q. And you understand that she
13 went out on maternity leave?

14 A. Yes.

15 Q. Did she come back?

16 A. She did and then left.

17 Q. Does Jessica still work for
18 Guidepoint?

19 A. I don't believe so. I think
20 she left shortly after we did.

21 Q. "We" meaning you and Bouker?

22 A. Correct.

23 Q. Did you have any conversations
24 with Jessica about her maternity
25 leave and demotion?

1 V. VILLETTI

2 A. No. We had very little time
3 in person.

4 Q. And why was that?

5 A. She was mostly working
6 remotely. I believe she was in
7 Philadelphia, where her husband was.
8 So she would come to the office one
9 day or two days a week.

10 Q. Did you have occasion to work
11 with Alyssa or Alisa?

12 A. We met a couple of times.

13 Q. What was your impression of
14 her?

15 A. What do you mean?

16 Q. In Guidepoint.

17 A. Her impression?

18 Q. What was your impression? She
19 was in the PR department?

20 A. Yes.

21 Q. And you met her a few times?

22 A. Yes.

23 Q. What was your impression about
24 her?

25 A. She was smart, competent, good

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1 V. VILLETTI

2 at her job.

3 Q. Would there have been a
4 PR team or PR Department that Alyssa
5 or Alisa reported to?

6 A. I believe she was in charge of
7 PR, and there were others reporting
8 to her.

9 Q. And you also spoke with Justin
10 about -- I'm going to try to get it
11 right -- about Ashlee, right?

12 A. Yes.

13 Q. About Ashlee's termination?

14 A. Yes.

15 Q. And it was your belief that
16 Ashlee was terminated because of her
17 gender?

18 A. Yes.

19 Q. And you shared that with
20 Justin?

21 A. Yes.

22 Q. What was his response?

23 A. I believe he agreed.

24 Q. And you also spoke with Justin
25 about Dr. Jibril?

1 V. VILLETTI

2 A. Yes.

3 Q. Justin interviewed Dr. Jibril,
4 right?

5 A. Yes.

6 Q. And you shared your concerns
7 with Justin that Dr. Jibril -- that
8 an offer was not extended to
9 Dr. Jibril because of her gender?

10 A. Yes.

11 Q. What was Justin's opinion?

12 A. He agreed.

13 Q. Does Justin still work for
14 Guidepoint?

15 A. I believe so.

16 Q. Okay. So you've had
17 conversations with Bouker and Justin
18 about your concerns of
19 gender discrimination. Did you speak
20 with anyone else?

21 A. I don't remember. I may have.

22 Q. Was there a reporting
23 procedure at Guidepoint about
24 discrimination complaints?

25 A. I'm sure there was.

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1 V. VILLETTI

2 Q. Was there an employee manual
3 policy?

4 A. Yes.

5 Q. Did you receive a copy of it?

6 A. I believe so.

7 Q. Do you recall anything in
8 there about the reporting procedures
9 for discrimination complaint?

10 A. I don't remember.

11 Q. Can you tell me what buy-side
12 or sell-side experience is in your
13 field, in the healthcare field?

14 A. The buy-side manages money and
15 the sell-side does not.

16 Q. Was either one of those
17 buy-side or sell-side experience a
18 requirement for the position you were
19 looking to put Dr. Jibril in?

20 A. I believe it was preferred,
21 but not required.

22 Q. Which experience?

23 A. Either.

24 Q. Was there a job description
25 for the position that Dr. Jibril was

1 V. VILLETTI

2 going to fill?

3 A. I believe so.

4 Q. Did you have a role in
5 drafting the job description?

6 A. I believe so.

7 Q. And it's your recollection
8 that it was a preference for either
9 buy-side or sell-side experience?

10 A. Yes, a preference, not a
11 requirement.

12 Q. Did you speak with Dr. Jibril
13 about buy-side or sell-side
14 experience?

15 A. Likely so.

16 Q. At her interview did
17 Dr. Jibril have either?

18 A. She did not.

19 Q. I believe we spoke earlier
20 about hires to fill the position that
21 you had wanted for Dr. Jibril,
22 correct?

23 A. Yes.

24 Q. And there were multiple hires?

25 A. I believe so.

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1 V. VILLETTI

2 Q. Did they have buy-side or
3 sell-side experience?

4 A. I believe so, but I'm not
5 sure.

6 Q. When would those hires have
7 been made?

8 A. After Bouker and I had left.

9 Q. So how is it that you know the
10 experience about the hires post your
11 termination?

12 A. I had looked at the website.

13 Q. You are seeking monetary
14 damages from Guidepoint; is that
15 correct?

16 A. That is correct.

17 Q. What amount?

18 A. It is my backpay.

19 Q. What do you understand the
20 amount of your backpay of the claim
21 to be?

22 A. My salary, plus bonus.

23 Q. Running from what period of
24 time?

25 A. From the time I was hired

1 V. VILLETTI

2 until now.

3 Q. And do you have a sense of
4 what that amount might be?

5 A. I don't off the top of my
6 head.

7 Q. Okay.

8 MR. GRECH: I need to take
9 a five minute break to find a
10 document.

11 MR. LICHTEN: Okay.

12 (Whereupon, a recess was
13 taken at this time.)

14 MR. GRECH: Can you mark
15 that as Defendant's Exhibit A,
16 please.

17 (Whereupon, Defendant
18 Guidepoint Global, LLC's First
19 Set of Interrogatories was marked
20 as Defendant's Exhibit A for
21 identification as of this date.)

22 Q. Ms. Villetti, we're showing
23 you what's been marked as Defendant's
24 Exhibit A. (Handing)

25 A. Okay.

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1 V. VILLETTI

2 Q. If you could take a moment to
3 look at that document, which I will
4 represent to you is Defendant's First
5 Set of Interrogatories to Plaintiff
6 in this action.

7 A. Okay.

8 Q. Have you had the chance to
9 look at the document?

10 A. This document?

11 Q. Yes.

12 A. Have I seen it before?

13 Q. That's a great question. Have
14 you ever seen that document before?

15 A. I may have. I don't remember.
16 Yes, I think I have. I don't know.

17 MR. GRECH: Can you mark
18 this as Defendant's Exhibit B,
19 please.

20 (Whereupon, Plaintiffs'
21 Response to Defendants First Set
22 of Interrogatories was marked as
23 Defendant's Exhibit B for
24 identification as of this date.)

25 Q. Ms. Villetti, we are now

1 V. VILLETTI

2 showing you what's been marked as
3 Defendant's Exhibit B, which we will
4 represent is Plaintiff's response to
5 Defendant's first set of
6 interrogatories as received from your
7 Counsel by my office.

8 If you could take a moment,
9 just look at Exhibit B and see if you
10 recognize that document.

11 A. Okay.

12 Q. Do you recognize Exhibit B?

13 A. No.

14 Q. Do you recognize Exhibit A?

15 A. I believe so.

16 Q. Do you recognize Exhibit A to
17 be Guidepoint's interrogatories to
18 you in this litigation?

19 A. Yes.

20 Q. Did you participate in the
21 crafting of the responses to those
22 interrogatories?

23 A. Yes.

24 Q. Are those responses reflected
25 in Exhibit B?

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1 V. VILLETTI

2 A. The responses I gave?

3 Q. Yes.

4 A. These are your objections.

5 Q. No, Exhibit B should be --

6 A. Oh yes, okay yes, yes.

7 Q. Plaintiffs' Exhibit B?

8 A. Yes.

9 Q. And have you seen Exhibit B
10 before today?

11 A. I believe so, yes.

12 Q. And since these work as sort
13 of question and answer, if I can
14 refer you to in Exhibit A,
15 Interrogatory Number 1, on Page 5.

16 A. (The witness complies).

17 Q. And then in Exhibit B,
18 Plaintiffs' Response, Page 1,
19 Response 1.

20 A. (The witness complies.) Okay.

21 Q. And I believe we had talked
22 before about a Jenna Applebaum. Do
23 you see Ms. Applebaum's name in
24 Response 1?

25 A. Yes.

1 V. VILLETTI

2 Q. Does that refresh your
3 recollection as to who Ms. Applebaum
4 might be?

5 A. No.

6 Q. I believe we had some of
7 the same concerns with Mr. Lukban; is
8 that correct? Do you know who
9 Mr. Lukban is?

10 A. Was he in HR? He sounds
11 familiar.

12 Q. Familiar in terms of
13 Guidepoint HR?

14 A. I don't know.

15 Q. Ms. Villetti, if I could have
16 you look at Interrogatory 11 on
17 Page 9, and then Plaintiffs'
18 Response, Response Number 11, it's
19 the third page in.

20 A. (The witness complies.)

21 Q. Interrogatory 11: Inquires
22 this to each and every measure of
23 damages sought in the complaint and
24 Plaintiffs' Response at 11 in
25 Exhibit B is, "Valletti is owned

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1 V. VILLETTI

2 \$334,000 in backpay." There is
3 another amount for Plaintiff Jibril.

4 "Plaintiffs are also seeking
5 reinstatement, punitive damages,
6 attorney's fees, costs,
7 disbursements, and interest.
8 Plaintiffs are not seeking
9 compensation for medical and
10 emotional distress."

11 Do you see that Ms. Villetti?

12 A. Yes.

13 Q. Is that a fair statement of
14 the damages you were seeking in this
15 case?

16 A. Yes.

17 Q. Can you explain how you arrive
18 at the \$334,000 in backpay?

19 A. It's the calculation of what I
20 would have made, had I been at
21 Guidepoint.

22 Q. And you're also seeking
23 reinstatement? We discussed that
24 before?

25 A. Yes.

1 V. VILLETTI

2 Q. And you're also seeking
3 punitive damages?

4 A. Yes.

5 Q. Do you know what punitive
6 damages are?

7 A. Do I know what I'm seeking or
8 what they are?

9 Q. Yes, in general, do you know
10 what punitive damages are? What is
11 your understanding of what
12 punitive damages are?

13 A. It's damages owed by the
14 company, in response to their
15 actions.

16 Q. Okay, and punitive having a
17 punishment context to --

18 A. Yes.

19 Q. And in what respect do you
20 think that Guidepoint should be
21 assessed punitive damages in this
22 case?

23 A. Because of their mistreatment
24 of women on basis of gender,
25 repeatedly.

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1 V. VILLETTI

2 Q. When we say repeatedly, we've
3 talked about Jessica and Ashlee and
4 Dr. Jibril, correct?

5 A. Yes.

6 Q. Are there other instances of
7 mistreatment of women at Guidepoint?

8 A. There may be, yes.

9 Q. That you are aware of?

10 A. Yes.

11 Q. What are they?

12 A. The person I referred to
13 earlier, who is involved with PR and
14 marketing, who was on maternity
15 leave, also left Guidepoint feeling
16 that she had been pressured because
17 she was on maternity leave.

18 Q. Alyssa or Alisa?

19 A. Yes.

20 Q. Anyone else?

21 A. There was someone in HR whose
22 name I don't recall. We can get back
23 to you on that.

24 Q. That you understood to also
25 have experienced gender

1 V. VILLETTI

2 discrimination at Guidepoint?

3 A. Yes.

4 Q. Ms. Villetti, do you know the
5 individual sitting to my right?

6 A. Yes.

7 Q. Who is she?

8 A. She is Counsel for Guidepoint.

9 Q. Do you know her as
10 Catherine Smith?

11 A. Yes.

12 Q. Was Ms. Smith Counsel for
13 Guidepoint for your entire
14 employment?

15 A. I believe so.

16 Q. We talked early about your
17 looking at Guidepoint's website. Was
18 Guidepoint's management team
19 portrayed on the website?

20 A. Likely so, yes.

21 Q. Speaking now for the time you
22 were there, who were the members of
23 Guidepoint's management team?

24 A. My recollections are there was
25 Albert Sebag as CEO; there was

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2 John Campanella, CFO; there was
3 Mike Ferrari as head of development;
4 and then there was a
5 Stacey (phonetic), I don't know what
6 she -- she's business development and
7 sales; and then Catherine Smith was
8 legal.

9 Q. Is Priscilla the head of HR?

10 A. Yes.

11 Q. Ms. Villetti, if I could ask
12 you to look, again, back and forth in
13 Exhibit A, Page 11, Number 23, and
14 your Plaintiffs' Response is -- Item
15 23, the last page of the document.

16 A. Mm-hmm.

17 Q. Interrogatory 23: "Identify
18 all individuals with knowledge
19 relating to any effort made by
20 Guidepoint to recruit you for
21 employment."

22 At 23, Plaintiffs object, but
23 then notwithstanding the objections
24 respond Villetti, Craig,
25 Jethanandani, Jibril, Lukban, and

1 V. VILLETTI

2 Applebaum; do you see that?

3 A. Yes.

4 Q. Mr. Craig mentioned in that
5 response, the recruiter that we
6 talked about before?

7 A. Yes, Chirag.

8 Q. Chirag.

9 MR. GRECH: Mark this as
10 Exhibit C, please.

11 (Whereupon, Defendant
12 Guidepoint Global, LLC's First
13 Set of Requests for Admission to
14 Plaintiffs Valerie Villetti and
15 Faiza Jibril, M.D. was marked as
16 Defendant's Exhibit C for
17 identification as of this date.)

18 Q. Ms. Villetti, we're showing
19 you what's been marked as Defendant's
20 Exhibit C for the purposes of today's
21 deposition (handing).

22 I'm going to represent to you
23 that it's Guidepoint's request for
24 Admission to Plaintiffs in this case,
25 as indicated in the caption, the

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1 V. VILLETTI

2 first page.

3 Ms. Villetti, if I can just
4 ask you to review that document.

5 A. Okay.

6 Q. Do you recognize that
7 document?

8 A. I've seen it before, yes.

9 MR. GRECH: You can mark
10 this as Exhibit D, please.

11 (Whereupon, Plaintiffs'
12 Response to Defendant's First Set
13 of Requests for Admissions was
14 marked as Defendant's Exhibit D
15 for identification as of this
16 date.)

17 Q. Ms. Villetti, we are now
18 showing you what's been marked as
19 Defendant's Exhibit D (handing).

20 For the purposes of today's
21 deposition, I'll represent to you
22 that it's Plaintiffs' Response to
23 Defendant's First Set of Requests for
24 Admissions, as received by my office
25 from your Counsel.

1 V. VILLETTI

2 If you can just take moment to
3 look at that document, please.

4 A. Okay.

5 Q. Do you recognize Exhibit D?

6 A. Yes.

7 Q. Did you participate in the
8 preparation of the responses included
9 in Exhibit D?

10 A. Yes.

11 Q. Exhibits C and D sort of work
12 the same as A and B. If I could ask
13 you to look at Exhibit C, Page 5,
14 Number 26, along with Plaintiffs'
15 Response, which is at the last page
16 of that document, Number 26.

17 A. (The witness complies.)

18 Q. A request for Admission from
19 Defendant Number 26 asks, "Following
20 the decision not to hire Jibril,
21 Guidepoint hired approximately 15
22 individuals to create content of
23 either buy-side or sell-side
24 experience and Plaintiffs' Response
25 is, at 26, "admit". Do you see that,

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2 Ms. Villetti?

3 A. Yes.

4 Q. First, does that refresh your
5 recollection as to how many
6 individuals were hired to fill the
7 position that you wanted Dr. Jibril
8 to fill?

9 A. Yes.

10 Q. Is it your testimony that all
11 of those 15 are men?

12 A. I don't know.

13 Q. Do you know what the gender
14 composition of those 15 individuals
15 are?

16 A. No.

17 Q. Ms. Villetti, when you were
18 employed by Guidepoint, was there an
19 investigation done of the Healthcare
20 Content team?

21 A. Could you define
22 "investigation"?

23 Q. Did you meet with Priscilla as
24 part of an investigation by
25 Guidepoint of the Healthcare team?

1 V. VILLETTI

2 A. I met with Priscilla following
3 my complaint.

4 Q. Is that the meeting that you
5 have discussed before after you sent
6 the e-mail to Priscilla?

7 A. Yes.

8 Q. After that e-mail complaint,
9 do you know if Priscilla met with
10 anyone else?

11 A. I don't know.

12 Q. Do you know if she met with
13 Bouker?

14 A. I don't know.

15 Q. Did you ever meet with
16 Ms. Smith?

17 A. No.

18 Q. Did you meet with anyone other
19 than Priscilla, regarding your
20 complaint?

21 A. No.

22 Q. Ms. Villetti, if you could
23 look back at Exhibit C, Page 3.

24 A. Okay.

25 Q. Are you aware of any colleague

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1 V. VILLETTI

2 remotely to be one of the reasons why
3 she was demoted?

4 A. No.

5 Q. When you made your complaint
6 to Priscilla, and we talked about
7 Rutwik, were you also complaining
8 about Albert?

9 A. Yes.

10 Q. In what respect?

11 A. In respect to him calling me
12 when I was in Boston.

13 Q. Okay. And that is in keeping
14 with your complaint about what --
15 hostile work environment?

16 A. Yes.

17 Q. And in what way did Albert's
18 calling you at the client meeting
19 involvement make it a hostile work
20 environment for you?

21 A. I did not report to Albert.
22 Albert did not have to approve my
23 travel. That was all done by my
24 supervisor, Bouker Pool, who had
25 already done all of those.

1 V. VILLETTI

2 Q. Was there anything in your
3 conversations with Albert about your
4 attendance in Boston that made you
5 feel that he was acting that way
6 because of your gender?

7 A. He was very disrespectful and
8 demeaning.

9 Q. Had you heard of occasions
10 where other specialists had there
11 attendance at meetings questioned?

12 A. No.

13 Q. Did you have conversations
14 with other specialists about
15 attending meetings?

16 A. I may have. I don't recall.

17 Q. When you got back from Boston,
18 did you speak with anyone and say,
19 "Albert just did this to me; has
20 anyone else experience this?"

21 A. Yes.

22 Q. Who did you speak to?

23 A. I spoke with Bouker, with
24 Priscilla, and with Justin.

25 Q. Okay. And let's start with

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1 V. VILLETTI

2 Justin, first. In his role that
3 you're aware of, would he have also
4 traveled to attend client meetings
5 and conferences?

6 A. Yes.

7 Q. And you shared with him what
8 Albert had said to you about your
9 trip to Boston?

10 A. Yes.

11 Q. And what was Justin's
12 response?

13 A. I don't recall.

14 Q. Correct me if I'm wrong:
15 Would there have been occasion for
16 Bouker to also travel for conferences
17 and meetings?

18 A. I don't know.

19 Q. Did you share with Bouker what
20 Albert had said to you about your
21 trip to Boston?

22 A. Yes.

23 Q. What did Bouker say in
24 response?

25 A. He said that he had run into

1 V. VILLETTI

2 Albert while they were both skiing,
3 and Albert had been unhappy to see
4 him on the slopes, and that he likely
5 called me to put his anger and
6 frustration on me.

7 Q. Okay. So Albert and Bouker
8 were skiing somewhere together or not
9 together, somewhere, at the same
10 time?

11 A. Yes.

12 Q. Bouker's impression was that
13 Albert was upset to see him skiing --

14 A. That's what he had said.

15 Q. -- and not at work?

16 A. Yes.

17 Q. And that it was Bouker's
18 impression that he took that anger --
19 Albert took the anger at Bouker out
20 on you?

21 A. Yes.

22 Q. Has Albert ever done that
23 before?

24 A. Apparently so.

25 Q. To you?

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1 V. VILLETTI

2 A. To others.

3 Q. Who?

4 A. I don't know, but I also had a
5 conversation with Priscilla.

6 Q. About the conversations with
7 Albert about Boston?

8 A. About that and Albert's known
9 outbursts.

10 Q. Okay. But you certainly
11 talked to Priscilla about the Boston
12 exchange?

13 A. Yes.

14 Q. What did you tell Priscilla?

15 A. What had occurred.

16 Q. I can't imagine Priscilla's
17 role calls for her to travel to
18 client meetings or conferences; is
19 that correct?

20 A. Yes.

21 Q. Did she share with you any
22 other stories of specialists being
23 called back for meetings or told that
24 they weren't approved to go to
25 meetings, anything like that?

1 V. VILLETTI

2 A. No.

3 Q. What response did she have for
4 you, at all, about your sharing this
5 with her?

6 A. She said that the response may
7 have had something to do with Albert
8 being frustrated in some other area.

9 Q. Why would Albert be upset with
10 Bouker for skiing, that you know?

11 A. That's me speculating about
12 Albert's state of mind.

13 Q. Don't speculate. How was the
14 healthcare team performing during
15 this time period?

16 A. We had increased our output as
17 it had been requested by Rutwik. So
18 we were producing more calls, and
19 this was despite the faculty
20 shortages where we weren't allowed to
21 hire people, and I didn't have an
22 associate anymore.

23 Q. Because Ms. Yamin left?

24 A. Yes.

25 Q. Was there any effort to

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1 V. VILLETTI

2 replace her?

3 A. Yes.

4 Q. What happened with those
5 efforts?

6 A. We hadn't hired someone yet.

7 Q. At the time of your
8 termination?

9 A. Yes.

10 Q. Well, how is it that you were
11 interviewing for a position to be
12 filled by Dr. Jibril and then it was
13 ultimately filled by 15 people?

14 A. You would have to ask Rutwik
15 about that.

16 Q. Was it your understanding that
17 the work that Dr. Jibril would
18 perform could be performed by one
19 person or she would have been the
20 first of many to follow?

21 A. The first of many to follow.

22 Q. Was there a communication from
23 management that they wanted an
24 increase in the number of
25 conferences?

1 V. VILLETTI

2 A. Yes.

3 Q. And who made that
4 communication?

5 A. Bouker.

6 Q. And he shared that with you?

7 A. I don't understand the
8 question.

9 Q. Bouker understood that
10 management wanted an increase in
11 conferences; is that correct?

12 A. Correct.

13 Q. Did Bouker tell you that?

14 A. Yes. He told all of us.

15 Q. In what circumstances did he
16 tell you this?

17 A. In a group meeting.

18 Q. What was your understanding as
19 to how management wanted the
20 conferences to increase?

21 A. We were to -- at what point,
22 because it changed?

23 Q. Did it have anything to do
24 with the need to hire an associate
25 and the position that Dr. Jibril

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1 V. VILLETTI

2 would fill?

3 A. Yes.

4 Q. So at that point, when you
5 decided we should hire an associate
6 and we should hire another content
7 specialist, were there communications
8 from management that the conference
9 number should increase?

10 A. If by "conference number," you
11 mean general output, yes.

12 Q. Okay. What else is included
13 in general output?

14 A. Teleconferences.

15 Q. Okay. So when I say
16 "conferences," you understand that to
17 mean in-person conferences?

18 A. Yes.

19 Q. Was the understanding that
20 management wanted an increase in just
21 telephone conferences or all
22 conferences?

23 A. All.

24 Q. Was there a particular number
25 that they wanted per week, per month,

1 V. VILLETTI

2 from the healthcare team?

3 A. No. There were no metrics.

4 Q. But the interviewing and the
5 application for the associate and
6 Dr. Jibril was part of that effort to
7 meet the increase in output?

8 A. Yes.

9 Q. If you had hired Dr. Jibril,
10 how many more candidates would you
11 have looked to hire for your team?

12 A. We didn't have a set number at
13 that point. We just knew that the
14 people would be expanding.

15 Q. But you certainly weren't
16 going to stop at one?

17 A. No.

18 Q. Was it going to be ten?
19 twenty?

20 A. We have not discussed that,
21 so.

22 Q. So there was an overlap with
23 your work and Ashlee's; is that
24 correct?

25 A. Yes.

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1 V. VILLETTI

2 Q. What was your impression of
3 how Ashlee performed her work?

4 A. She was experienced and
5 knowledgeable.

6 Q. And did you interact with
7 Ashlee or did you sort of keep your
8 clients and matters separate?

9 A. No, I was instructed to talk
10 to her and learn whatever I could.

11 Q. What were your impressions of
12 Ashlee, sort of as a colleague?

13 A. She was friendly and helpful.

14 Q. Did you express a concern
15 about not meeting with Ashlee during
16 your interview process?

17 A. Yes.

18 Q. Why was that a concern?

19 A. I felt I was mislead.

20 Q. In what respect?

21 A. I was told that this was a new
22 team.

23 Q. You were told that the
24 Healthcare Content Team was a new
25 team?

1 V. VILLETTI

2 A. Yes.

3 Q. Who told you that?

4 A. Several people during the
5 interview process.

6 Q. Bouker?

7 A. Sure.

8 Q. Priscilla?

9 A. Sure.

10 Q. And were you brought in as a
11 Senior Content Strategist, correct?

12 A. Yes. I was practically the
13 head of healthcare content.

14 Q. And you were mislead in that
15 it was not a new team?

16 A. Yes, and that there was
17 someone performing that function.

18 Q. Ashlee?

19 A. Yes.

20 Q. And if I recall what we
21 discussed earlier, it was your
22 understanding that once you got a
23 good grasp, you were to take over for
24 Ashlee?

25 A. Yes.

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1 V. VILLETTI

2 Q. So then why would Ashlee have
3 interviewed you?

4 A. Because she had been there for
5 a long time with experience, and knew
6 what would go into being a good
7 content specialist for healthcare.

8 Q. And it was your impression
9 that she had what it took to be a
10 good content specialist for
11 healthcare?

12 A. Yes.

13 Q. Was that Bouker's opinion?

14 A. I don't know.

15 MR. LICHTEN: Could we go
16 off the record for a second,
17 please?

18 (Whereupon, a discussion was
19 held off the record.)

20 MR. GRECH: It's 1:57. I
21 understand that Ms. Villetti is
22 here today with a hard stop at
23 2:00, which we are going to
24 respect. I have a couple of
25 discreet questions that I would

1 V. VILLETTI

2 like to ask you now we will end
3 at 2:00.

4 There may be another line
5 of questioning that I will
6 reserve time to perhaps call
7 you for another deposition or
8 not. I will speak to your
9 Counsel about that, but I do
10 want to respect your 2:00 hard
11 stop today.

12 Q. Ms. Villetti, if I can ask you
13 to look back at one of the exhibits
14 we had marked, Exhibit B, and
15 particularly we had looked at it
16 before, Item 11 or Response 11.

17 In that, your Interrogatory
18 Response is that, you, Villetti, are
19 owed \$334,000 in backpay; do you see
20 that?

21 A. Yes.

22 Q. We've talked about backpay
23 before. What is your understanding
24 of -- it's really a legal concept --
25 of backpay?

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1 V. VILLETTI

2 A. On the basis that I was
3 dismissed due to discrimination and
4 retaliation, I am owed the money I
5 would have made, have I still been in
6 the position.

7 Q. So backpay as a concept would
8 mean that a Plaintiff if terminated
9 from an unlawful reason would be
10 entitled to his or her compensation
11 from the date of that termination to
12 date or resolution?

13 A. As I understand it.

14 Q. Does your understanding of
15 backpay include anything else, about
16 obligations upon a Plaintiff to be
17 entitled to backpay?

18 A. I don't know.

19 Q. Do you understand that a
20 plaintiff must seek to mitigate
21 damages; are you familiar with that
22 expression?

23 A. No.

24 Q. Is it your understanding that
25 a plaintiff must seek subsequent

1 V. VILLETTI

2 employment in order to be entitled to
3 the full amount of backpay?

4 A. I don't know.

5 Q. Have you sought subsequent
6 employment since being terminated by
7 Guidepoint?

8 A. I have been employed.

9 Q. For Kioko?

10 A. Yes.

11 Q. And we talked earlier -- have
12 you submitted applications to any
13 other employer?

14 A. No.

15 Q. And you worked for PWC for the
16 project?

17 A. Yes.

18 MR. GRECH: I wanted to
19 just, in this remaining moment,
20 talk more about Alyssa or
21 Alisa.

22 For one, I'd like to -- if
23 we can just leave a blank in
24 there for clarification, if
25 it's Alyssa or Alisa.

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1 V. VILLETTI

2 THE WITNESS: Yes.

3 (INSERT) _____

4 Q. She was also out on maternity
5 leave?

6 A. Yes.

7 Q. How did you come to learn that
8 she was experiencing gender-based
9 discrimination?

10 A. She left Guidepoint after I
11 did when she returned her maternity
12 leave, and I spoke with her,
13 subsequently.

14 Q. What did you and Alyssa speak
15 about concerning your impression that
16 she was perhaps subject to
17 gender-based discrimination?

18 A. We spoke about Guidepoint's
19 pattern of discrimination against
20 women.

21 Q. And Alyssa ultimately left
22 Guidepoint?

23 A. Yes.

24 Q. Where is Alyssa now?

25 A. I don't know.

1 V. VILLETTI

2 Q. Did Alyssa give you any
3 examples of this pattern that she was
4 experiencing or had observed, rather?

5 A. No. We discussed her,
6 specifically.

7 Q. Okay. And in what respect did
8 Alyssa feel that she was the subject
9 of gender-based discrimination?

10 A. You'd have to ask her, but
11 what I recall from the conversation
12 is that she felt that when she
13 returned, the position had changed
14 and there were new constraints that
15 would interfere with her ability to
16 also be a mother to her child.

17 Q. And it was your understanding
18 that Alyssa was the head of the
19 PR Department?

20 A. Yes.

21 Q. Okay.

22 MR. GRECH: All right.

23 It's 2:01, so I would like to
24 stop now subject to what we
25 talked about earlier. I do

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1

V. VILLETTI

2

want to respect Ms. Villetti's

3

hard stop of 2:00. Thank you.

4

THE WITNESS: Thank you.

5

MR. LICHTEN: Thank you.

6

(Time noted: 2:01 p.m.)

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INSTRUCTIONS TO WITNESS

Please read your deposition over carefully and make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it.

You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition.

It is imperative that you return the original errata sheet to the deposing attorney within thirty (30) days of receipt of the deposition transcript by you. If you fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.

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2

I N D E X O F W I T N E S S E S

3

WITNESS: VALENTIA VILLETTI

4

EXAMINATION BY

PAGE

5

MR. GRECH

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I N D E X O F E X H I B I T S

7

EXHIBIT

DESCRIPTION

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9

A

Defendant

151*

10

Guidepoint Global,

11

LLC's First Set of

12

Interrogatories

13

B

Plaintiffs'

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14

Response to

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Defendants First

16

Set of

17

Interrogatories

18

C

Defendant

161*

19

Guidepoint Global,

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LLC's First Set of

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Requests for

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Admission to

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Plaintiffs Valerie

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Villette and Faiza

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Jibril, M.D.

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2 D Plaintiffs' 162*

3 Response to

4 Defendant's First

5 Set of Requests

6 for Admissions

7

8 (*Indicates exhibit(s) retained by counsel)

9

10 I N D E X R E Q U E S T S

11 DESCRIPTION PAGE

12 contract 42

13 total compensation from PWC 43

14 Alyssa or Alisa 184

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17 PAGE LINE QUESTIONING ATTORNEY

18 39 25 MR. GRECH

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4 PAGE LINE CHANGE

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A C K N O W L E D G E M E N T

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STATE OF NEW YORK)

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:SS

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COUNTY OF _____)

6

I, VALENTIA VILLETTI, hereby certify that I

7

have read the transcript of my testimony taken

8

under oath on October 1st, 2019, that the

9

transcript is a true, complete and correct

10

record of what was asked, answered and said

11

during my testimony under oath, and that the

12

answers on the record as given by me are true

13

and correct, except for the corrections or

14

changes in form or substance, if any, noted in

15

the attached Errata Sheet.

16

17

18

VALENTIA VILLETTI

19

20

Signed and subscribed to

21

before me, this _____ day

22

of _____, _____.

23

24

25

Notary Public

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2

C E R T I F I C A T E

3

I, SALVATRICE MANNINO, a shorthand reporter
and Notary Public within and for the State of
New York, do hereby certify:

6

That the Witness(es) whose testimony is
hereinbefore set forth was duly sworn by me,
and the foregoing transcript is a true record
of the testimony given by such Witness(es).

10

I further certify that I am not related to
any of the parties to this action by blood or
marriage, and that I am in no way interested
in the outcome of this matter.

14

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21

Salvatrice Mannino

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23



24

Salvatrice Mannino, a Court
Reporter and Notary Public

25

Date: October 11th, 2019

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LAWYER'S NOTES

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NOTE

